1	L. LIN WOOD, P.C.	CHATHAM LAW GROUP
2	L. Lin Wood (admitted pro hac vice) lwood@linwoodlaw.com	Robert Christopher Chatham chris@chathamfirm.com
3	Nicole J. Wade (admitted pro hac vice)	CA State Bar No. 240972
4	nwade@linwoodlaw.com Jonathan D. Grunberg (admitted <i>pro hac vice</i> )	3109 W. Temple St. Los Angeles, CA 90026
-	jgrunberg@linwoodlaw.com	213-277-1800
5	G. Taylor Wilson (admitted <i>pro hac vice</i> ) twilson@linwoodlaw.com	WEISBART SPRINGER HAYES, LLP
6	1180 West Peachtree Street, Ste. 2040 Atlanta, Georgia 30309	Matt C. Wood (admitted <i>pro hac vice</i> ) mwood@wshllp.com
7	404-891-1402	212 Lavaca Street, Ste. 200 Austin, TX 78701
8	404-506-9111 (fax)	512-652-5780
9		512-682-2074 (fax)
10	Attorneys for Plaintiff Vernon Unsworth	
11		
12	QUINN EMANUEL URQUHART & SULLIVAN, LLP	QUINN EMANUEL URQUHART & SULLIVAN, LLP
13	Alex B. Spiro (admitted pro hac vice)	Robert M. Schwartz (Bar No. 117166)
14	alexspiro@quinnemanuel.com 51 Madison Avenue, 22nd Floor	robertschwartz@quinnemanuel.com Michael T. Lifrak (Bar No. 210846)
15	New York, New York 10010 Telephone: (212) 849-7000	michaellifrak@quinnemanuel.com Jeanine M. Zalduendo (Bar No. 243374)
16	1010pitolie (212) 015 7000	jeaninezalduendo@quinnemanuel.com
17		865 South Figueroa Street, 10th Floor Los Angeles, California 90017-2543
18	Attorneys for Defendant Elon Musk	
19		S DISTRICT COURT
20	CENTRAL DISTRI	ICT OF CALIFORNIA
21	VERNON UNSWORTH,	Case No. 2:18-cv-08048
22	*	
23	Plaintiff,	Judge: Hon. Stephen V. Wilson
24	VS.	JOINT EXHIBIT LIST
25	ELON MUSK,	
26	Defendant.	Pretrial Conference: Nov. 25, 2019 Trial Date: Dec. 3, 2019
27		
28		
	JOINT E	XHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and Local Rule 16-6, Plaintiff Vernon Unsworth and Defendant Elon Musk, hereby jointly submit the Trial Exhibit List, attached as Exhibit A. The parties reserve the right to use at trial: (a) exhibits to be used solely for impeachment pursuant to F.R. Civ. P. 26(a)(3)(A)(iii) and Local Rule 16-2.3; (b) exhibits obtained through trial subpoenas or otherwise produced after the date of this filing; and (c) documents the need for which could not reasonably have been anticipated in advance of trial. 

1 2	Dated: November 18, 2019	L. LIN WOOD, P.C. L. Lin Wood
		Nicole J. Wade
3		Jonathan D. Grunberg G. Taylor Wilson
4		or ragion wheeli
5 6		WEISBART SPRINGER HAYES, LLP Matt C. Wood
7		CHATHAM LAW GROUP
•		Robert Christopher Chatham
8		
9		By: /s/ L. Lin Wood
10		L. Lin Wood
11		Attorneys for Plaintiff Vernon Unsworth
12		
13		QUINN EMANUEL URQUHART
		& SULLIVAN, LLP Alex Spiro
14		Robert M. Schwartz
15		Michael T. Lifrak
16		Jeanine M. Zalduendo
17		By: /s/ Alex Spiro_
18		Alex Spiro
		Attorneys for Defendant Elon Musk
19		
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		- 2 - JOINT EXHIBIT LIST
		JOINT EXHIBIT LIST

Exhibit No.	Description	Objections	Date Identified	Da Adm
1 (D)	Complaint for Defamation	P: • Relevance		
2 (D)	Plaintiff Vernon Unsworth's Responses and Objections to Elon Musk's First Set of Interrogatories			
3 (D)	Plaintiff Vernon Unsworth's Verification of Responses; Elon Musk's First Set of Interrogatories			
4 (P*) (D)	Photographs of Unsworth	D:  • Relevance (non-rescue pictures)		
5 (D)	Extraction diagram by Vernon Unsworth	P:     Relevance     Misleading		
6 (D)	Article: An Inside Story of the Tham Luang Cave Rescue with Vernon Unsworth	P:      Hearsay     Relevance		
7 (D)	BCCT Multi-Chambers Chiang Mai Business Networking - Q&A session from British diving expert Vernon Unsworth	P:     Hearsay     Relevance		
8 (D)	Email from Vernon Unsworth to Adam Fellows re Description			
10 (P*) (D)	Photograph of Unsworth			
11 (D)	Tweet from Elon Musk			
12 (D)	Tweet from Elon Musk			
13 (P*) (D)	Vernon Unsworth CNN Interview (Video)			
14 (P*) (D)	Vernon Unsworth CNN Interview (Video)			
15 (D)	Email from Vernon Unsworth to Mark Stephens			
16 (D)	Tweet from Elon Musk			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
17	Report: Situational Analysis of	P:		
(D)	the Commercial Sexual	<ul> <li>Hearsay</li> </ul>		
,	Exploitation of Children,	Relevance		
	Thailand	<ul><li>Prejudice</li></ul>		
		<ul><li>Misleading</li></ul>		
18	Tweet from Elon Musk	Williams		
(D)				
19	Tweet from Elon Musk			
(P*)				
(D)				
20	Tweet from Elon Musk			
(D)	I W 11 // F M 1			
21	L. Wood letter to E. Musk			
(P*)				
(D) 22	Tweet from Elon Musk			
(P*)	I weet from Elon Wask			
(D)				
23	BuzzFeed News Article "In A	D:		
(P*)	New Email Elon Musk Accused	Hearsay		
(D)	A Caver Of Being A 'Child			
,	Rapist' And Said He 'Hopes'			
	There's A Lawsuit"			
24	Vernon Unsworth Time Interview			
(D)	(Video)			
25	Article: British cave diver	P:		
(D)	considering legal action over Elon	<ul> <li>Hearsay</li> </ul>		
	Musk's 'pedo' attack	<ul> <li>Relevance</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
26	Vernon Unsworth Interview			
(D)	(Video)	7		
27	Article: British caver says he	P:		
(D)	approached by U.S., British	<ul> <li>Hearsay</li> </ul>		
28	lawyers over Musk's comments Article: Hero British diver	P:		
(D)	Vernon Unsworth responds as			
(D)	Elon Musk revives 'paedo' claim	• Foundation		
29	Vernon Unsworth BBC Interview	• Hearsay P:		
(D)	(Video)	Relevance		
30	News18 Article "British Diver	P:		
(P*)	Who Sued Elon Musk Over 'Pedo	• Hearsay		
(D)	Guy' Insult Makes it to UK	Ticaisay		
	Honours List"			
L		<u> </u>		<u> </u>

Exhibit No.	Description	Objections	Date Identified	Date Admitted
31 (P*) (D)	BuzzFeed News Article "The Cave Rescuer Elon Musk Called A 'Pedo' Has Lawyered Up And Is Preparing A Libel Claim"	D:  • Hearsay		
33 (D)	Facebook page in Thai with English translation	P:     Authenticity     Foundation     Hearsay     Relevance     Prejudice     Misleading		
34 (P*)	Article: The Inside Story "Getting the Boys Out" Tham Luang Cave Rescue	D:  • Hearsay • Foundation		
35 (P*)	Email Teller and Musk re: Apology	D:     Foundation     Hearsay     Relevance     FRE 403		
36 (P*) (D)	Email Birchall and Howard re: NDA	P:  • Hearsay		
37 (P*) (D)	LLW Letter to Musk			
38 (P) (D)	Musk Tweets (version containing all three successive tweets)			
39 (P*) (D)	Musk Tweet beginning "As this well-written article suggests"			
40 (P*) (D)	Musk Tweet re: "Bet ya a signed dollar it's true"			
41 (P*) (D)	Musk Tweet in response to Drew Olanoff beginning "You don't think it's strange"			
42 (P) (D)	Email Mac and Musk re: Child Rapist and Child Bride			
43 (P)	Musk Tweet re: SEC	D:		

- 5 -JOINT EXHIBIT LIST

Exhibit No.	Description	Objections	Date Identified	Date Admitted
44	BuzzFeed News Certified			
(P*)	Articles			
(D)				
45	Financial Times Article "Elon	D:		
(P*)	Musk's weakness for self-	Hearsay		
	promotion masks his potential"	<ul><li>Relevance</li><li>FRE 403</li></ul>		
46	Cave Survey	• FRE 403		
(P*)				
(D)				
47	WhatsApp chat printout	P:		
(D) 48	Photo of Tube	Hearsay		
48 (P*)	Photo of Tube			
(D)				
49	Email Musk and Branson re:	D:		
(P*)	accusations	<ul> <li>Hearsay</li> </ul>		
		• Relevance		
		(Branson		
50	Texts Unsworth and Vanessa	statements) D:		
(P*)	Unsworth	Hearsay		
, ,		<ul> <li>Foundation</li> </ul>		
		<ul> <li>Relevance</li> </ul>		
		• FRE 602		
<i>E</i> 1	F 1 C V	• FRE 403		
51 (D)	Email from Vernon Unsworth to Adam Fellows re Watch "Hero	P: • Relevance		
(D)	"ถาหลวง"thailand" on YouTube	Refevance		
52	Woranan ("Tik") Ratrawiphakkun	D:		
(P*)	ID card	<ul> <li>Foundation</li> </ul>		
(D)	D 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	70		
53 (D)	Facebook page in Thai with English translation	P:		
(D)	Liighsh translation	<ul><li>Authenticity</li><li>Foundation</li></ul>		
		Hearsay		
		Relevance		
		<ul> <li>Prejudice</li> </ul>		
		Misleading		
54A	Photo	P:		
(D) 54B	Photo	• Relevance P:		
(D)	1 Hoto	• Relevance		
· • · ·	İ	- IXCIC VALICE		ĺ

Exhibit No.	Description	Objections	Date Identified	Date Admitted
54C	Photo	P:		
(D)		<ul> <li>Relevance</li> </ul>		
54D	Photo	P:		
(D)		<ul> <li>Relevance</li> </ul>		
54E	Photo	P:		
(D)		Relevance		
54F	Photo	P:		
(D)	Photo	Relevance		
54G (D)	Photo	P: • Relevance		
54H	Photo	P:		
(D)	Thoto	• Relevance		
54I	Photo	P:		
(D)		Relevance		
54J	Photo	P:		
(D)		<ul> <li>Relevance</li> </ul>		
55	Document in Thai	P:		
(D)		<ul> <li>Authenticity</li> </ul>		
		<ul> <li>Hearsay</li> </ul>		
		• Relevance		
		Prejudice		
<i>5.6</i>	M ' 11 1, 1 1 1 1 1	Misleading		
56 (P*)	Messaging Heltsley and Harris re: Rescue	P:		
(D)	Reseuc	• Hearsay		
57	Tube Specifications	P:		
(P*)	1	<ul> <li>Hearsay</li> </ul>		
(D)		-		
58	WhatsApp Chat	P:		
(P*)		<ul> <li>Hearsay</li> </ul>		
(D)	Will the City	D		
59 (P*)	WhatsApp Chat	P:		
(D)		• Hearsay		
60	Email Musk and Bowman re:	P:		
	Rescue	Hearsay		
(D)		,		
61	Email Mac, Musk, Teller,	P:		
(P*)	Birchall re: BuzzFeed Request for	<ul> <li>Hearsay</li> </ul>		
(D)	Comment	D:		
		• FRE 403		
		• FRE 602		
		<ul> <li>Foundation</li> </ul>		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
62 (P*) (D)	Email Howard, Musk, Ortiz, Teller re: Investigation	P:  • Hearsay		
63 (P*)	BuzzFeed News Article "Elon Musk Has Always Been At War With The Media"	D:     Hearsay     Relevance     FRE 403		
64 (P*) (D)	Email Howard and Birchall re: Investigation	P:  • Hearsay		
65 (P*) (D)	Email Howard and Birchall re: Investigation	P:  • Hearsay		
66 (P*) (D)	Email Howard and Birchall re: Investigation	P:     • Hearsay D:		
		<ul><li>FRE 403</li><li>Relevance</li><li>FRE 404</li></ul>		
67 (P*) (D)	Texts Howard and Birchall re: Investigation	P:  • Hearsay		
68 (P*) (D)	Email Howard and Birchall re: Investigation	P:  • Hearsay		
69 (P*) (D)	Tweets by Ryan Mac	D:     Hearsay     Relevance     FRE 403		
70 (P*) (D)	Email Mac, Musk, Birchall re: Request for Comment	P:  • Hearsay		
71 (P*) (D)	Email Birchall and Howard re: Investigation	P:  • Hearsay		
72 (P*) (D)	Email Howard and Birchall re: Investigation	P:  • Hearsay		
73 (P*) (D)	Email Howard and Birchall re: Investigation	P:  • Hearsay		

No.	Description	Objections	Date Identified	Date Admitted
74 (P*)	Email Howard and Birchall re: Investigation	P:  • Hearsay		
(D)	investigation	Ticarsay		
75	Email Howard and Birchall re:	P:		
(P*) (D)	Investigation	Hearsay		
76	Email re: Ongoing Litigation	D:		
(P*)		• Relevance		
		• FRE 403		
		<ul><li>FRE 404</li><li>Foundation</li></ul>		
77	Email Teller, Zaveri, Gleeson,	P:		
(P*)	O'Brien, Behrend re: Press	<ul> <li>Hearsay</li> </ul>		
(D) 78	Inquiry  Empil Taller Davis Ivasces rev	D:		
(P*)	Email Teller, Davis, Juncosa re: Cave Rescue	• Foundation		
(- )		Hearsay		
		• Relevance		
		• FRE 403		
79	Empil Mantin, Handy, Tallan	• FRE 602 P:		
(P)	Email Martin, Hardy, Teller, O'Brien, Arnold re: Press Inquiry	• Hearsay		
(D)		Treatsay		
80	Email Otto and Tesla Comms.	P:		
(P) (D)	Re: Press Coverage	• Hearsay D:		
(D)		• Foundation		
		Hearsay		
		• Relevance		
0.1	D 114 117 1	• FRE 403		
81 (P)	Email Arnold and Higgins re: Press Inquiry	D: • Foundation		
(1)	1 ress inquiry	Hearsay		
		Relevance		
		• FRE 403		
	Email Riley and Arnold re: Press	D:		
82 (P)	Email Riley and Arnold re: Press Inquiry	<ul> <li>Foundation</li> </ul>		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
83 (P)	Email Selk, SpaceX media, Tesla media, Arnold etc. re: Press Inquiry	D:     Foundation     Hearsay     Relevance     FRE 403		
84 (P)	Email Teller, Arnold, Hardy, O'Brien, Martin re: Press Inquiry	D:     Foundation     Hearsay     Relevance     FRE 403		
85 (P*)	Musk Tweet re: Media	D:  Relevance FRE 403		
86 (P*)	Email Musk and Branson re: Accusations	D:      Foundation     Hearsay     FRE 403     Relevance     (Branson statement)		
88 (P*)	Email Davis, Musk, Teller re: Cave Rescue	D:     Foundation     Hearsay     (Osotthanakorn statement)		
89 (P*)	Email Teller, Balajadia, Members of Press re: Cave Rescue	,		
90 (P*)	Email Teller and Musk re: Investor Response	D:     Foundation     Hearsay     Relevance     FRE 403		
91 (P)	Email Musk and Teller re: Apology	D:     Foundation     Hearsay     Relevance     FRE 403		
92 (P)	Email O'Brien, Teller, Maron, Arnold, Gleeson, Chen re: Press Coverage	D:     Foundation     Hearsay     Relevance     FRE 403		

- 10 -JOINT EXHIBIT LIST

Exhibit No.	Description	Objections	Date Identified	Date Admitted
93 (P*)	Email Teller, Glover, O'Brien re: Press Coverage	D:     Foundation     Hearsay     Relevance		
94 (P*)	Email Arnold, Norman, Musk, Teller re: Press Coverage/Inquiry	<ul><li>FRE 403</li><li>D:</li><li>Hearsay</li><li>Foundation</li><li>FRE 403</li></ul>		
95 (P*)	Email Schmidbaur, Teller, Tesla Press, Zillis, O'Brien, SpaceX Media, Arnold et. al re: Press Coverage	D:     Foundation     Hearsay     Relevance     FRE 403		
96 (P*)	Email Nesbitt, Glover, Musk, Arnold, Teller re: Accusations	D:     Foundation     Hearsay     Relevance     FRE 403		
97 (P*) (D)	Email Caplan and Davis re: Cave Rescue	P:     Hearsay D:     Foundation     Hearsay     Relevance     FRE 403		
98 (P*) 99	Texts Davis and Musk re: Cave Rescue Texts Davis and Teller re: Cave	D:		
(P*)	Rescue	<ul><li>Foundation</li><li>Hearsay</li><li>Relevance</li><li>FRE 403</li></ul>		
100 (P*)	Texts Davis and Teller re: Cave Rescue	D:     Foundation     Hearsay     Relevance		
101 (P) 102 (P*)	Tweets @elonmusk & @GossiTheDog Email Musk and Davis re: Cave Rescue	• FRE 403		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
103 (P*)	Email Musk, Davis, Teller re: Cave Rescue	D:     Foundation     Hearsay     Relevance     FRE 403		
104 (P*)	Texts Arnold and O'Brien re: Accusations	D:  • Foundation • Hearsay • Relevance • FRE 403		
105 (P*)	Texts Arnold and Musk re: Press Coverage	D:     Foundation     Hearsay     Relevance     FRE 403		
106 (P)	Email Chen and Tesla Comm. Re: Press Coverage	D:     Foundation     Hearsay     Relevance     FRE 403		
107 (P*) (D)	Email Arnold, Glover, Smith, Mac re: Press Coverage	P:  • Hearsay		
108 (P*)	Email Mac and Arnold re: Press Coverage	D: • Incomplete		
109 (P*) (D)	Email Arnold, Musk, Teller, Maron re: Press Coverage	P:  • Hearsay		
110 (P*) (D)	Email Arnold, Musk, Teller, Maron, O'Brien re: Press Coverage	P:  • Hearsay		
111 (P*) (D)	Email Mac and Arnold re: Press Coverage	P:  • Hearsay		
123 (D)	Article: Elon Musk to go to trial over 'pedo' tweet about British diver Vernon Unsworth	P:  • Hearsay		
124 (D)	Article: A British Cave Rescuer Is Officially Suing Elon Musk For Calling Him A Pedophile	P:  • Hearsay		
125 (D)	Article: Elon Musk hits back against lawsuit by caver he called a 'pedo guy'	P:  • Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
126	The Society of Professional	P:		
(D)	Journalists' Code of Ethics	<ul> <li>Hearsay</li> </ul>		
127 (D)	Vernon Unsworth Google search results	P:  • Hearsay		
128	Lin Wood Tweet	P:		
(D)	Zin weed I weet	Relevance		
		<ul> <li>Hearsay</li> </ul>		
129	Lin Wood Tweet	P:		
(D)		<ul> <li>Relevance</li> </ul>		
		Hearsay		
130	Lin Wood Tweet	P:		
(D)		Relevance		
122	I E D	Hearsay		
132 (P*)	Jansen Expert Report	D:		
(P*)		<ul><li>Hearsay</li><li>Foundation</li></ul>		
		• FRE 403		
		<ul> <li>FRE 403</li> <li>Motion In</li> </ul>		
		Limine		
133	Jansen CV	D:		
(P*)		Hearsay		
134	Jansen List of Testimony	D:		
(P*)		<ul> <li>Hearsay</li> </ul>		
135	Jansen List of Documents	D:		
(P*)	Referenced	<ul> <li>Hearsay</li> </ul>		
136	Jansen List of Articles Containing	D:		
(P*)	Defaming Statements	<ul> <li>Hearsay</li> </ul>		
(D)		<ul> <li>Foundation</li> </ul>		
		Motion In		
127		Limine		
137 (P*)	Jansen Supporting and	D:		
(P·)	Supplementary Documents	<ul><li>Hearsay</li><li>Foundation</li></ul>		
		<ul><li>Foundation</li><li>Motion In</li></ul>		
		Limine		
138	Jansen List of Countries with	D:		
(P*)	Sites That Disseminated Articles	Hearsay		
	Containing Defaming Statements	<ul><li>Foundation</li></ul>		
		Motion In		
		Limine		
139	Jansen Retainer Agreement			
(P*)				
(D)				

- 13 -JOINT EXHIBIT LIST

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	140	Jansen Invoice			
3	(P*)				
	(D)				
4	141	Jansen Invoice			
5	(P*) (D)				
6	142	Jansen Time and Expense Sheet			
O	(P*)				
7	(D)				
8	143	Letter agreement between	P:		
0	(D)	Bernard (Jim) Jansen and Quinn Emanuel	• Relevance		
9	144	Letter agreement between	P:		
10	(D)	Bernard (Jim) Jansen and Quinn	• Relevance		
10	,	Emanuel			
11	145	printout re foxnews.com website			
12	(D)	performance			
12	146	Jansen Spreadsheet	P:		
13	(P*) (D)		• Completeness D:		
14	(D)		<ul><li>Hearsay</li></ul>		
14	147	Article: The Internet is Mostly	P:		
15	(D)	Bots	Hearsay		
16			<ul> <li>Foundation</li> </ul>		
			<ul> <li>Relevance</li> </ul>		
17			<ul> <li>Prejudice</li> </ul>		
18	1.10		Misleading		
	148	printout from cars.com	P:		
19	(D) 149	Article: The Week in Tesla News:	Relevance		
20	(D)	Snoozing on Autopilot, Musk			
		'Deletes' Twitter and the EV			
21		Evolution			
22	150	Article: How Accurate Are			
	(D)	Website Traffic Estimators?			
23	151	Article: Find Out How Much	P:		
24	(D)	Traffic a Website Gets: 3	<ul> <li>Hearsay</li> </ul>		
		Ways Compared	• Foundation		
25			• Relevance		
26			<ul><li>Prejudice</li><li>Misleading</li></ul>		
	152	Article: Elon Musk Calls Thai	• Iviisicauiiig		
27	(D)	Cave Diver Hero A 'Child Rapist'			
28		As He Escalates Baseless Feud			

- 14 -JOINT EXHIBIT LIST

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	153	Article: If You're Calling			
3	(D)	Someone a 'Pedo' on Twitter,			
4		Elon Musk, It's Time to Take a Long, Hard Look at Your Life			
5	200 (P)	Musk Tweet re "signed dollar" responding to @GossiTheDog			
6	201	stating "pedo"  Musk Tweet re: purported	D:		
7	(P)	apology beginning with "As this	• Foundation		
		well-written article suggests"	• Hearsay		
8		replying to @adamchavez	• Relevance		
9	202	Marala Tarra et una fratura de la	• FRE 403		
10	202 (P)	Musk Tweet re: "strange he hasn't sued me" with comments			
	203	Email Howard and Birchall re:			
11	(P*)	Investigation			
12	204 (P*)	Google Results for "James	D:		
13	(P·)	Howard Jupiter" "Before Aug 15, 2018"	<ul><li>Not provided</li><li>Authenticity</li></ul>		
13		2010	• Foundation		
14			• FRE 602		
15	205	Daily Echo Article "Businessman	D:		
	(P*)	stole £426,000 from company's accounts despite being given	• Foundation		
16		'numerous second changes'"	<ul><li>Hearsay</li><li>Relevance</li></ul>		
17		5	• FRE 403		
18	206	Email Musk and Glover re:	D:		
	(P*)	Accusations	• Foundation		
19			• Hearsay		
20			<ul><li>Relevance</li><li>FRE 403</li></ul>		
21	207	Mac Declaration filed in San	D:		
	(P*)	Francisco Discovery Action	• Hearsay		
22	208	BuzzFeed News Article "People	D:		
23	(P*)	Really Aren't Here for Elon Musk's Rescue Submarine"	• Foundation		
		Widsk's Rescue Submarme	<ul><li>Hearsay</li><li>Relevance</li></ul>		
24			• FRE 403		
25	209	BuzzFeed News Article "Elon	D:		
26	(P*)	Musk Didn't Help Save The Thai	• Foundation		
		Boys. Now He's Attacking Someone Who Did"	• Hearsay		
27		Someone who Did	<ul><li>Relevance</li><li>FRE 403</li></ul>		
28		1	- 1101 103		1

Exhibit No.	Description	Objections	Date Identified	Date Admitted
210	BuzzFeed News Article "Elon	D:		
(P*)	Musk Has Revisited His Baseless	<ul> <li>Hearsay</li> </ul>		
	Pedophile Claims"	• FRE 403 (re		
211	BuzzFeed News article "The	SEC)		
(P*)	Cave Rescuer Elon Musk Called	<ul><li>Hearsay</li></ul>		
( )	A 'Pedo' Has Lawyered Up And	litearsay		
	Is Preparing A Libel Claim"			
212 (P)	Musk Google Alerts	D:		
(P)		<ul><li>Hearsay</li><li>Relevance</li></ul>		
		• FRE 403		
		• FRE 602		
213	Musk Google Alerts	D:		
(P)		• Hearsay		
		Relevance		
		• FRE 403		
214	Musk Google Alerts	• FRE 602 D:		
(P)	Widsk Google Alerts	Hearsay		
<b>\</b>		Relevance		
		• FRE 403		
		• FRE 602		
215 (P)	Musk Google Alerts	D:		
(P)		<ul><li>Hearsay</li><li>Relevance</li></ul>		
		• FRE 403		
		• FRE 602		
216	Musk Google Alerts	D:		
(P)		<ul> <li>Hearsay</li> </ul>		
		• Relevance		
		<ul><li>FRE 403</li><li>FRE 602</li></ul>		
217	Musk Google Alerts	D:		
(P)		Hearsay		
		• Relevance		
		• FRE 403		
210	M 10 1 11	• FRE 602		
218 (P)	Musk Google Alerts	D:		
(1)		<ul><li>Hearsay</li><li>Relevance</li></ul>		
		• FRE 403		
		• FRE 602		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
219	Musk Google Alerts	D:		
(P)		<ul> <li>Hearsay</li> </ul>		
		• Relevance		
		• FRE 403		
220	Marila Caralla Alanta	• FRE 602		
220 (P)	Musk Google Alerts	D:  • Hearsay		
(1)		Relevance		
		• FRE 403		
		• FRE 602		
221	Musk Google Alerts	D:		
(P)		<ul> <li>Hearsay</li> </ul>		
		• Relevance		
		• FRE 403		
222	M 1 C 1 A1	• FRE 602		
222 (P)	Musk Google Alerts	D:		
(r)		<ul><li>Hearsay</li><li>Relevance</li></ul>		
		• FRE 403		
		• FRE 602		
223	Quora Article "What's the full	D:		
(P)	story behind Elon Musk's	<ul> <li>Foundation</li> </ul>		
	involvement with the Thai cave	<ul> <li>Hearsay</li> </ul>		
	rescue effort?"	• Relevance		
22.4	D1: 20 M 12 N : 6	• FRE 403		
224 (P*)	Dkt. 30 – Musk's Notice of Motion and Motion to Dismiss	D: • Relevance		
(1 )	Plaintiff Vernon Unsworth's	<ul><li>Relevance</li><li>FRE 403</li></ul>		
	Complaint; Memorandum of	• 1 KL 703		
	Points and Authorities			
225	Dkt. 45 – Defendant Elon Musk's			
(P*)	Answer to Plaintiff's Complaint	D.		
226 (P*)	Email Gleeson, Teller, Lee re: Cave Rescue	D:		
(1 )	Cave rescue	<ul><li>Hearsay</li><li>Relevance</li></ul>		
		• FRE 403		
227	Email Teller to various reporters	- 1102 703		
(P*)	re: Cave Rescue			
228	Email O'Brien, Tesla Comms.,	D:		
(P*)	and Liddle re: Press Coverage	• Hearsay		
		Relevance		
220	Email LLW DC 4: Mail	• FRE 403		
229	Email LLW PC to Musk			

- 17 -JOINT EXHIBIT LIST

Exhibit No.	Description	Objections	Date Identified	Date Admitted
230	Email LLW PC to Musk			
(P*)				
231	Email LLW PC to Musk			
(P*)				
232	Musk Tweet "This reaction has			
(P*)	shaken my opinion of many			
	people"			
233	Email Birchall and Howard re:			
(P*)	Investigation			
234	Email Birchall and Howard re:			
(P*)	Investigation			
235	Email Birchall and Howard re:			
(P*)	Investigation			
236	Email Birchall and Howard re:			
(P*)	Investigation			
237	Email Birchall and Howard re:			
(P*)	Investigation			
238	Email Birchall and Howard re:			
(P*)	Investigation Email Rive and Musk re: Cave			
239 (P*)	Rescue			
240	Email Jeremy Arnold, Teller,	D:		
(P*)	Norman, Birchall, Balajadia re:	• Hearsay		
(1 )	Quora Article	Relevance		
	Quota i indete	• FRE 403		
241	Email Jeremy Arnold, Teller,	D:		
(P*)	Musk, Davis re: Quora Article	• Hearsay		
(1 )	Widsk, Bavis ic. Quota i itioic	Relevance		
		• FRE 403		
242	Email Arnold, Teller, Norman,	D:		
(P*)	Birchall re: Quora post	• Hearsay		
(* )	Zirinaii ie. Quota post	Relevance		
		• FRE 403		
243	Email Teller and Arnold re:	D:		
(P*)	Quora post	Hearsay		
(1)	Quoin post	Relevance		
		• FRE 403		
244	Email Musk and Thailand Team	• 1 KL 403		
(P*)	re: Cave Rescue			
245	Email Yu, Musk, Ortiz re: Cave			
(P*)	Rescue			
246	Email Harris, Musk, Teller, and			
(P*)	Thailand Team re: Cave Rescue			
247	Email Stanton and Musk re: Cave			
(P*)	Rescue			

JOINT EXHIBIT LIST

Exhibit No.	Description	Objections	Date Identified	Date Admitted
248	Email Stanton and Musk re: Cave			
(P*)	Rescue			
249	Text Musk re: Cave Rescue			
(P*)				
250 (P*)	Musk Tweet re: Cave Rescue			
251	Email Musk and Eby re: Cave			
(P*)	Rescue			
252 (P*)	Musk Tweets re: Cave Rescue			
253	Email Musk, Teller, Birchall,	D:		
(P*)	Arnold re: Press Inquiry	<ul><li>Hearsay</li><li>Foundation</li></ul>		
		• Relevance		
254	Email Musk and Schwartz re:	• FRE 403		
254 (P*)	Accusations			
255	Email Musk and Shanklin re:	D:		
(P*)	Press	***		
(1 )	Tress	<ul><li>Hearsay</li><li>Foundation</li></ul>		
		Relevance		
		• FRE 403		
256	Email Davis, Teller et al. re: Cave	● FRE 403		
(P*)	Rescue			
257	Email Davis to Thailand Team re:			
(P*)	Cave Rescue			
258	AIG Policy (subject to meet and	D:		
(P*)	confer)	• FRE 403		
(1)		• Stipulation		
		• FRE 411		
259	AIG Declarations Page (subject to	D:		
(P*)	meet and confer)	• FRE 403		
( <del>-</del> )		• Stipulation		
		• FRE 411		
260	Musk Tweet re: Cave Rescue	* 1 KD 711		
(P*)	Trade I week to. Cave Resour			
261	Musk Tweet re: Cave Rescue			
(P*)	industrial control control control			
262	Musk Tweets re: Cave Rescue			
(P*)				
263	Musk Tweet re: Cave Rescue			
(P*)				
264	Musk Tweets re: Cave Rescue			
(P*)				

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1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2 3	265 (P*)	Musk Tweets re: Cave Rescue			
4	266 (P*)	Musk Tweet re: Cave Rescue			
5	267 (P*)	Musk Tweet re: Cave Rescue			
6	268 (P*)	Musk Tweet re: Cave Rescue			
7	269 (P*)	Musk Tweet re: Cave Rescue			
8	270 (P*)	Musk Tweet re: Cave Rescue			
9	271 (P*)	Musk Tweet re: Cave Rescue			
11	272 (P*)	Musk Tweets re: Cave Rescue			
12	273 (P*)	Musk Tweets re: Cave Rescue			
13	274 (P*)	Loup Ventures "An Open Letter to Elon Musk"	D:  • Hearsay		
14			<ul><li>Foundation</li><li>Relevance</li></ul>		
15 16	275	Fortune Article "After Elon	• FRE 403		
17	(P*)	Musk's 'Pedo'; Tweet, Tesla Shares Fall 4% as Some Investors	<ul><li>Hearsay</li><li>Foundation</li></ul>		
18		Worry About His Erratic Behavior"	Relevance     FRE 403		
19	276 (P*)	Business Insider Article "One of Tesla's largest shareholders is	D:  • Hearsay		
20		urging Elon Musk to simmer down and focus after a	<ul><li>Foundation</li><li>Relevance</li></ul>		
21	277	tumultuous few weeks"	• FRE 403		
<ul><li>22</li><li>23</li></ul>	277 (P*)	Bloomberg Article "The Last Bet-the-Company Situation':	D: • Relevance		
24	278	Q&A With Elon Musk"  Musk Tweet re "taking Tesla	• FRE 403 D:		
25	(P*)	private"	<ul><li>Relevance</li><li>FRE 403</li></ul>		
26			• Motion In Limine		
27	279	Email Mac and Musk re:	• FRE 404		
28	(P*)	Accusations/Cave Rescue			

1 Exhibit No.	Description	Objections	Date Identified	Date Admitted
$2 {280}$	Email Birchall and Howard re:			
3 (P*)	Investigation			
281	Email Davis, Musk, Thailand			
4 (P*)	Team re: Cave Rescue			
$5 \begin{vmatrix} 282 \\ (P*) \end{vmatrix}$	Email Davis, Dunn, Musk re:			
(1 )	Cave Rescue			
$6 \frac{283}{(P^*)}$	Email Davis, Bowman et al. re: Cave Rescue			
7 284	Cave Survey from The Guardian			
$  P^*  $	Cave Survey from the Guardian			
8 285	Email Mitchell and Arnold re:	D:		
9 (P)	Press Inquiry	Hearsay		
9		<ul> <li>Relevance</li> </ul>		
0		• FRE 403		
286	Email Higgins and Arnold re:	D:		
1 (P)	Press Inquiry	• Hearsay		
2		• Foundation		
2		Relevance		
3 287	Essail as Dasas In assists	• FRE 403		
$4 \left\  \frac{287}{(P)} \right\ $	Email re: Press Inquiry	D:  • Hearsay		
		Relevance		
5		• FRE 403		
6 288	Arnold and Mumtaz re: Press	D:		
(P)	Inquiries	Hearsay		
7		• Relevance		
8		• FRE 403		
289	Email Levin, Arnold, O'Brien et	D:		
9 (P)	al. re: Press Inquiry	• Hearsay		
0		Relevance		
	E '14 11 10'P '	• FRE 403		
1 290 (P*)	Email Arnold and O'Brien re:	D:		
$2 \parallel (P^*)$	Press Coverage	<ul><li>Hearsay</li><li>Foundation</li></ul>		
		Relevance		
3		• FRE 403		
4 291	Email O'Brien and Tesla Comms.	D:		
·    (P*)	re: complaints	Hearsay		
5	_	<ul> <li>Foundation</li> </ul>		
6		• Relevance		
		• FRE 403		
7				
8				
		- 21 -		
	JOINT	EXHIBIT LIST		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
292	Email O'Brien, Chen, Arnold re:	D:		
(P*)	Press Coverage	<ul> <li>Hearsay</li> </ul>		
		• Foundation		
		• Relevance		
293	Email O'Brien and Arnold re:	• FRE 403 D:		
(P*)	Press Inquiry	Hearsay		
		<ul> <li>Foundation</li> </ul>		
		• Relevance		
201		• FRE 403		
294 (P*)	Email Arnold, Delaville, O'Brien	D:		
(F·)	et al. re: Press Coverage	<ul><li>Hearsay</li><li>Foundation</li></ul>		
		Relevance		
		• FRE 403		
295	Email Glover and Arnold re:	D:		
(P*)	Press Coverage	<ul> <li>Hearsay</li> </ul>		
		• Relevance		
296	Email Clayer Amald Musls	• FRE 403		
(P*)	Email Glover, Arnold, Musk, Teller, O'Brien, Antonini re:	• Hearsay		
(1)	BuzzFeed Accusations	• Foundation		
		Relevance		
		• FRE 403		
		(statements by		
297	Email Amald Tay Antonini ra	others) D:		
(P*)	Email Arnold, Tay, Antonini re: Press Coverage	• Hearsay		
	11ess coverage	<ul><li>Foundation</li></ul>		
		Relevance		
		• FRE 403		
298	Email Arnold and Tesla Comms.	D:		
(P*)	re: Press Inquiries	Relevance		
299	Email Arnold and Teller re: Press	• FRE 403 D:		
(P*)	Inqiury	• Hearsay		
(- )	1	<ul><li>Foundation</li></ul>		
		• Relevance		
		• FRE 403		
300 (D*)	Email with Photo of Unsworth			
(P*) 301	Photo of Unsworth			
(P*)	1 HOLO OF CHSWOLLI			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
302	Photo of Unsworth			
(P*)	DI 4 CII 41			
303 (P*)	Photo of Unsworth			
304	Photo of Unsworth			
(P*)	1 hoto of Chsworth			
305	Email Ellis and Unsworth re:			
(P*)	Cave Rescue			
306	Email Unsworth re: Cave Survey			
(P*)				
307	Cave Survey with handwritten			
(P*) 308	notes  Emails Stanton and Musk re:			
308 (P*)	Emails Stanton and Musk re: Cave Rescue			
309	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
310	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
311	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
312	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
313	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
314	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
315	Emails Stanton and Musk re:			
(P*)	Cave Rescue			
316	Emails Stanton and Musk re:			
(P*)	Cave Rescue Email Lever and Unsworth re:			
317 (P*)	MBE			
318	Email Unsworth and Blanch re:			
(P*)	Investiture			
319	Email re: Commendation			
(P*)				
320	Email Unsworth and Thai	D:		
(P*)	Embassy re: Immigration Records	<ul> <li>Foundation</li> </ul>		
221		Hearsay		
321	Email Unsworth and Harris re:			
(P*)	Documentary 1 Natural			
322 (P*)	Cave Surveys and Notes			
323	Cave Photograph			
(P*)	Cave i notograph			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
324	Photograph of Unsworth			
(P*)				
325	Unsworth Passport (reserving			
(P*)	right to enter actual passport)			
326	Photograph of Unsworth			
(P*)	Distance 1 of House			
327 (P*)	Photograph of Unsworth			
328	Video of Cave Rescue/Unsworth	D:		
(P*)	video of Cave Resede/Ollsworth	• Relevance		
(1)		• FRE 403		
329	Tik ID	D:		
(P*)		• Foundation		
330	Unsworth Passport	1 0 0,21 0,01		
(P*)				
331	Photos of tube			
(P*)				
332	Cave Survey			
(P*)				
333	Text Unsworth and Vanessa	D:		
(P*)	Unsworth	Hearsay		
		• Foundation		
		• Relevance		
334	Email Teller, Musk, Davis re:	• FRE 403		
(P*)	Cave Rescue			
335	Email Musk and Shotwell re:			
(P*)	Cave Rescue			
336	Email Musk and Shotwell re:			
(P*)	Cave Rescue			
337	Email Musk re: Cave Rescue			
(P*)				
338	Email Stubbings and Musk re:	D:		
(P*)	Cave Rescue	• Hearsay		
		• Foundation		
		Relevance		
220	F 101 1111 61	• FRE 403		
339	Email Glover and Hilton file	D:		
(P*)	titled "Email_Glover_Hilton re Elon's pedo comment" (produced	• Hearsay		
	by Ridgley Walsh)	<ul><li>Foundation</li><li>Relevance</li></ul>		
	- Jangery Walding	<ul><li>Relevance</li><li>FRE 403</li></ul>		
		▼ FRE 403		[

Exhibit No.	Description	Objections	Date Identified	Date Admitted
340 (P*)	Email Glover, Arnold, Teller, Musk file titled "Email_Glover_Teller re 60 Mins" (produced by Ridgley Walsh)	D:      Hearsay     Relevance     FRE 403		
354 (P*)	Excel Spreadsheet re: Jansen Underlying Data	D:  Motion In Limine Relevance FRE 403		
355-1 through 355-558 (P)	Articles and Publications Relied Upon by Jansen	D:     Hearsay     Authenticity     Foundation     Relevance		
356-1 through 356-363 (P*)	Visitor Data Relied Upon by Jansen	D:      Hearsay     Authenticity     Foundation     Relevance     FRE 403		
357-1 through 357-38 (P*)	Direct References by Jansen in Report	D:      Hearsay     Authenticity     Foundation     Relevance     FRE 403		
358-1 through 358-8 (P*)	Additional Information Reviewed by Jansen	D:      Hearsay     Authenticity     Foundation     Relevance     FRE 403		
359 (P*)	Excel Spreadsheet re: Jansen Underlying Data	D:      Hearsay     Foundation     Relevance     FRE 403     Motion In     Limine		
360 (P*)	Declaration of Jessica Probus (BuzzFeed Records Certification) with attachments			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
361	Second Declaration of Jessica			
(P*)	Probus (BuzzFeed Records			
	Certification) with attachments			
362	Tesla Form 8-K dated November	D:		
(P*)	5, 2013	<ul> <li>Relevance</li> </ul>		
		• FRE 403		
		<ul> <li>Hearsay</li> </ul>		
363	Musk's October 1, 2019 iCloud			
(P*)	Certification			
364	Tesla Records Custodian			
(P*)	Declaration			
365	Boring Company Records			
(P*)	Custodian Declaration			
366	SpaceX Records Custodian			
(P*) 367	Declaration			
(P*)	Unsigned Agency Agreement			
368	The Tham Luang Cave Rescue –	D:		
(P*)	A Personal Account by Martin	<ul><li>Hearsay</li></ul>		
(1 )	Ellis	<ul><li>Foundation</li></ul>		
	Ems	A .1		
		<ul><li>Authenticity</li><li>Relevance</li></ul>		
		• FRE 403		
369	Email Howard and Birchall re:	FRE 403		
(P*)	Investigation			
370	Email Howard and Birchall re:			
(P*)	Investigation			
371	Email Teller and Musk re: Media			
(P*)	Contact			
372	Email Teller, Birchall, Musk re:			
(P*)	Press Inquiry			
373	Email Musk and Benson re: Flint	D:		
(P*)		<ul> <li>Hearsay</li> </ul>		
		<ul> <li>Foundation</li> </ul>		
		<ul> <li>Relevance</li> </ul>		
		• FRE 403		
374	Musk Google Alerts	D:		
(P*)		<ul> <li>Hearsay</li> </ul>		
		<ul> <li>Foundation</li> </ul>		
		• Relevance		
		• FRE 403		
375	Musk Google Alerts	D:		
(P*)		<ul> <li>Hearsay</li> </ul>		
		<ul> <li>Relevance</li> </ul>		

Exhibit No.	Description		Objections	Date Identified	Date Admitted
376	Musk Google Alerts	D:			
(P*)		•	Hearsay		
		•	Relevance		
377	Email Musk to Musk re: Tweet	D:			
(P*)		•	Hearsay		
		•	Relevance		
378	List of Ongoing Litigation	D:			
(P*)		•	Hearsay		
		•	Foundation		
		•	Relevance		
270	Unsworth CNN Interview Video	•	FRE 403		
379 (P*)	Unsworth CNN Interview Video				
380	Text Musk and Teller				
(P*)	Text Wusk and Tener				
381	Text Musk and Davis				
(P*)					
382	Text Musk and Harris				
(P*)					
383	Text Musk and O'Brien				
(P*)	T . M 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
384 (P*)	Text Musk and Arnold				
385	Text Musk and Grimes	D:			
(P*)	Text Wusk and Griffies	D.	Hearsay		
(1)		•	Foundation		
		•	Relevance		
		•	FRE 403		
386	Email Reymenants and Davis				
(P*)					
387	Email Glover, Hilton, Felten	D:			
(P*)	(Produced by Ridgley Walsh)	•	Hearsay		
		•	Foundation		
		•	Relevance		
200	D'11 W 11 D	•	FRE 403		
388	Ridgley Walsh Records				
(P*) 389	Certification executed by Glover Musk Twitter Profile				
(P*)	WILLSE I WILLE I TOTTIC				
390	Musk Twitter Profile				
(P*)					
391	Musk Twitter Profile				
(P*)					

Exhibit No.	Description	Objections	Date Identified	Date Admitted
392 (P*)	Complaint in the matter of United States Securities and Exchange Commission vs. Elon Musk	D:      Hearsay     Foundation     Relevance     FRE 403     Motion In     Limine		
393 (P*)	Consent Motion for Entry of Final Judgment, Consent of Defendant Elon Musk, and Final Judgment as to Defendant Elon Musk	D:      Hearsay     Foundation     Relevance     FRE 403     Motion In     Limine		
394 (P*)	U.S. S.E.C. Press Release "Elon Musk Settles SEC Fraud Charges; Tesla Charged With and Resolves Securities Law Charge"	D:      Hearsay     Foundation     Relevance     FRE 403     Motion In     Limine		
395 (P*)	Complaint in the matter of United States Securities Exchange Commission vs. Tesla, Inc.	D:     Hearsay     Foundation     Relevance     FRE 403     Motion In     Limine		
396 (P*)	Consent Motion for Entry of Final Judgment, Consent of Defendant Tesla, Inc., and Final Judgment as to Defendant Tesla, Inc.	D:      Hearsay     Foundation     Relevance     FRE 403     Motion In     Limine		
397 (P*)	Email T. Wilson to M. Lifrak Re: SERVICE – Unsworth v. Musk, Case no. 2:18-cv-08048-SVW-JC – Initial Disclosures	D:     Relevance     FRE 403		
	_	- 28 -		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
398 (P*)	Declaration of Jared Birchall	D:     Foundation     Relevance     Work Product     Hearsay     FRE 403		
399 (P*)	Defendant's Privilege Log	D:     Foundation     Relevance     Work Product     Hearsay     FRE 403		
500 (D)	PIA reprimands Burgess Wreford & Unsworth	P:      Hearsay     Relevance     Prejudice		
501 (D)	Mark Stephens Tweet: Hip Hip Hoo Ray @Buzzfeed	P:      Hearsay     Relevance     Prejudice		
502 (D)	Article: Media lawyers: Why Donald Trump is unlikely to sue in UK or US over 'dirty dossier' media revelations	P:      Hearsay     Relevance     Prejudice		
503 (D)	Article: Buzzfeed seeks court order forcing Press Gazette to release confidential journalistic material	P:      Hearsay     Relevance     Prejudice		
504 (D)	Article: A Media Lawyer Says There Will Be A Huge "Chilling Effect" From The Daily Mail's Libel Payout To Melania Trump	P:      Hearsay     Relevance     Prejudice		
505 (D)	Email from John Paczkowski to Dave Arnold re story on NLRB charges	P:     Relevance     Hearsay		
506 (D)	Email from Caroline O'Donovan to Dave Arnold re response to worksafe report?	P:  Relevance Hearsay		
507 (D)	Email from Caroline O'Donovan to Dave Arnold re nlrb complaint response	P:  • Relevance • Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
508	BuzzFeed News Standards and	P:		
(D)	Ethics Guide	<ul> <li>Relevance</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
		<ul> <li>Confusion</li> </ul>		
509	Email from Caroline O'Donovan	P:		
(D)	to Dave Arnold re comment on	<ul> <li>Relevance</li> </ul>		
	elon's tweet?	<ul> <li>Hearsay</li> </ul>		
510	Email from Caroline O'Donovan	P:		
(D)	to Gina Antonini; Dave Arnold re	<ul> <li>Relevance</li> </ul>		
	cuts to salaried employees?	Hearsay		
511	Article: Heavy rains frustrate	P:		
(D)	search for teen soccer team	• Relevance		
510	trapped in Thai cave	Hearsay		
512	Article: As Search for Thai Boys	P:		
(D)	Lost in Cave Hits Day 5, a Nation Holds Its Breath	• Relevance		
512		Hearsay		
513	British Cave Explorer Joins	P:		
(D)	Search for Missing Thai Soccer	• Relevance		
514	Team (Transcript) British Cave Explorer Joins	P:		
(D)	Search for Missing Thai Soccer	• Relevance		
(D)	Team (Video)	Refevance		
515	Article: Thai cave rescuers try	P:		
(D)	another entry point to find	<ul> <li>Relevance</li> </ul>		
· /	trapped soccer team	<ul> <li>Hearsay</li> </ul>		
516	BBC ฟง นนทชนก วงษสมทร	P:		
(D)	บบชไทย - BBC Thai (Video)	<ul> <li>Relevance</li> </ul>		
517	Crews Search Thai Cave for	P:		
(D)	Missing Teens (Transcript)	<ul> <li>Relevance</li> </ul>		
518	Crews Search Thai Cave for	P:		
(D)	Missing Teens (Video)	Relevance		
519	Article: 7 days in the dark: Time	P:		
(D)	is running out for teenage soccer	<ul> <li>Relevance</li> </ul>		
· /	team	<ul> <li>Hearsay</li> </ul>		
520	Article: 9 days of hell: Inside the	P:		
(D)	race to save a soccer team trapped	<ul> <li>Relevance</li> </ul>		
	in a cave	<ul> <li>Hearsay</li> </ul>		
521	Article: Thailand Cave Rescue	P:		
(D)	Turns to How to Extract Trapped	<ul> <li>Relevance</li> </ul>		
	Soccer Team	<ul> <li>Hearsay</li> </ul>		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
522	Article: British caver is hailed a	P:		
(D)	'magician' after convincing Thai	<ul> <li>Relevance</li> </ul>		
	officials to bring in heroic UK	<ul> <li>Hearsay</li> </ul>		
	divers who found stranded			
	schoolboys, aided by his			
502	knowledge of the tunnels	n.		
523	Elon Musk Tweet: Boring Co has	P:		
(D)	advanced ground penetrating	<ul> <li>Hearsay</li> </ul>		
	radar & is pretty good at digging			
	holes. Don't know if pump rate is limited by electric power or			
	pumps are too smal. If so, could			
	dropship fully charged			
	Powerpacks and pumps.			
524	Elon Musk Tweet: I suspect that	P:		
(D)	the Thai govt has this under	Hearsay		
(-)	control, but I'm happy to help if	Hoursdy		
	there is a way to do so			
525	Email from Elon Musk to Steve	P:		
(D)	Davis re Is there anything we	<ul> <li>Hearsay</li> </ul>		
	could do short notice?	·		
526	Email from Elon Musk to Steve	P:		
(D)	Davis; Jared Birchall re Flint,	<ul> <li>Hearsay</li> </ul>		
	Michigan			
527	Mine Rescue Document	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
528	Elon Musk Tweet: Maybe worth			
(D)	trying: insert a 1m diameter nylon			
	tube (or shorter set of tubes for			
	most difficult sections) through			
	cave network & inflate with air			
	like a bouncy castle. Should create an air tunnel underwater			
	against cave roof & auto-conform			
	to odd shapes like the 70cm hole.			
529	Email from Sam Teller to Elon	P:		
(D)	Musk; Steve Davis re Rescue	• Hearsay		
(2)	help	- Hoursay		
530	Article: Thailand cave rescue: Ex-	P:		
(D)	navy diver dies on oxygen supply	Hearsay		
` /	mission			
			·	1
		31 -		
		XHIBIT LIST		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
531	Elon Musk Tweet: Building	P:		
(D)	double-layer Kevlar pressure	<ul> <li>Hearsay</li> </ul>		
	pods with Teflon coating to slip			
	by rocks & front/rear rope tow			
	hitch & lead pockets for neutral			
	buoyancy. ~60 cm oval. Testing this aft in a pool with a subject			
	who has never done SCUBA. Do			
	the divers think something like			
	this might work?			
532	Elon Musk Tweet: Does you			
(D)	know output voltage & amperage			
	of those generator trucks? 3			
	phase? What frequency? Will			
	need high voltage transformer to			
	carry power over distance or very thick cable. Beyond that, only			
	batteries will work. Will prep			
	Powerwalls in case needed.			
533	Elon Musk Tweet: Looks like 1st	P:		
(D)	bit of water is close enough to	<ul> <li>Hearsay</li> </ul>		
	entrance to be pumped out. 2nd &			
	3rd would need battery packs, air			
	pumps & tubes. If depth of 2nd is			
	accurate, would need ~0.5 bar			
	tube pressure. Prob need to enter tube, zip up & then transit.			
534	Elon Musk Tweet: Prob wise to	P:		
(D)	add an air tank (butt end fwd to	Hearsay		
(- <i>)</i>	take impacts) in nose of pod &	iioaisay		
	vent valve in rear. Set air tank to			
	slow bleed rate, then no need for			
	SCUBA mouthpiece or regulator.			
	Training unnecessary & less			
525	susceptible to panic attack.	D.		
535 (D)	Elon Musk Tweet: Should be possible to increase the air inflow	P:		
(D)	rate above the leak rate, unless	• Hearsay		
	there is a very big hole. If oxygen			
	% is dropping, suggests that leak			
	holes are not large.			
				•
		22		
	-	- 32 - XHIBIT LIST		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
536	Elon Musk Tweet: SpaceX &	P:		
(D)	Boring Co engineers headed to	<ul> <li>Hearsay</li> </ul>		
	Thailand tomorrow to see if we			
	can be helpful to govt. There are			
	probably many complexities that			
	are hard to appreciate without being there in person.			
537	Elon Musk Tweet: Yeah, that's	P:		
(D)	what I'm talking about in that	Hearsay		
	tweet — double-layer Kevlar	110012009		
	pressure pod with Teflon coating.			
	Other approach is a long			
	inflatable air sock. Both worth			
520	trying.	D		
538	Email from Andrew Branagh to	P:		
(D)	Charlie Notthoff; Steve Davis; Michael Altenhofen re info	• Relevance		
539	Email from Elissa Butterfield to	P:		
(D)	Sam Teller; Steve Davis re Thai	Relevance		
	cave tube: Zero-force zipper	<ul> <li>Hearsay</li> </ul>		
	solution	,		
540	Email from Elon Musk to Chris	P:		
(D)	Bowman re Thai soccer team	<ul> <li>Hearsay</li> </ul>		
5.4.1	rescue	D		
541	Email from Elon Musk to Lyndon Rive re Thailand Dive Rescue	P:		
(D)		Hearsay		
542 (D)	Email from Elon Musk to Zach	P:		
543	Dunn re Thai Support Email from James Gleeson to	• Hearsay P:		
(D)	Begona Blanco Munoz; SpaceX	• Hearsay		
(D)	Media Relations; Yazhou Sun et	Ticarsay		
	al. re CNN International			
	Interview Enquiry - Elon Musk			
544	Email from Lyndon Rive to Elon	P:		
(D)	Musk re Thailand	<ul> <li>Hearsay</li> </ul>		
545	Email from Nuttapon Nakarach to	P:		
(D)	Steve Davis; Sam Teller;	<ul> <li>Hearsay</li> </ul>		
	Jonathan Hofeller et al. re Rescue			
546	help Email from Sam Teller to Dave	P:		
(D)	Arnold; Evelyn Tay; Steve Davis	• Hearsay		
	re Elon Musk, Concerning	• 110a1say		
	Thailand Rescue 12 Boys			

- 3

Exhibit No.	Description	Objections	Date Identified	Date Admitted
547 (D)	Email from Sam Teller to David O'Gorman; Will Draffin; Elisa Butterfield et al. re TONIGHT / Flight to Thailand	P:  • Hearsay		
548 (D)	Email from Sam Teller to Elon Musk re Underwater surveying			
549 (D)	Email from Steve Davis to Florence Li; Christopher	P:  • Hearsay		
	Bowman; Christopher Wallden et al. re Rescue help	Ticarsay		
550 (D)	Email from Steve Davis to Sam Teller; Vincent Werner; Florence Li et al. re Internal distro	P:  • Hearsay		
551 (D)	Email from Steve Davis to Thailand re Pod and Tube update	P:  • Hearsay		
552 (D)	Elon Musk Tweet: 4 handles/hitch points on front & 4	P:  • Hearsay		
	on rear. 2 air tank connections on front & 2 on rear, allowing 1 to 4 tanks simultaneously connected,			
	all recessed for impact protection w secondary cap seal if leak			
552	develops.  Elon Musk Tweet: Construction	P:		
553 (D)	complete in about 8 hours, then 17 hour flight to Thailand	• Hearsay		
554 (D)	Elon Musk Tweet: Continue to be amazed by the bravery, resilience & tenacity of kids & diving team	P: • Relevance		
	in Thailand. Human character at its best.			
555 (D)	Elon Musk Tweet: Extremely talented dive team. Makes sense	P: • Relevance		
556	given monsoon. Godspeed.  Elon Musk Tweet: Fitted for a kid	P:		
(D)	or small adult to minimize open air. Segmented compartments to	• Hearsay		
	place rocks or dive weights & adjust bouyancy.			
		24		
		XHIBIT LIST		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
557	Elon Musk Tweet: Got more	P:		
(D)	great feedback from Thailand.	<ul> <li>Hearsay</li> </ul>		
	Primary path is basically a tiny,	•		
	kid-size submarine using the			
	liquid oxygen transfer tube of			
	Falcon rocket as hull. Light			
	enough to be carried by 2 divers,			
	small enough to get through narrow gaps. Extremely robust.			
558	Elon Musk Tweet: Some good	P:		
(D)	feedback from cave experts in	• Hearsay		
(D)	Thailand. Iterating with them on	Ticarsay		
	an escape pod design that might			
	be safe enough to try. Also			
	building an inflatable tube with			
	airlocks. Less likely to work,			
	given tricky contours, but great if			
7.50	it does.			
(D)	Elon Musk Tweet: Will do. Even if not useful here, perhaps it will			
(D)	be in a future situation.			
560	Email from Andrew Liptak to	P:		
(D)	James Gleeson; SpaceX Media	Hearsay		
	Relations re Request for			
	Comment: Escape Pod			
561	Email from Armor Harris to	P:		
(D)	Thailand re Notes from Chat with	<ul> <li>Hearsay</li> </ul>		
7.60	Ben Reymenants (Diver on Site)	7		
562	Email from Brandon Hahn to	P:		
(D)	Steve Davis; Shakes; Matt Chambers et al. re Thailand	• Hearsay		
	survey			
563	Email from Elon Musk to	P:		
(D)	EMDesk re Thailand soccer team	Hearsay		
	rescue: Conditions now "most			
	suitable" but monsoon threatens			
564	Email from Elon Musk to Sam	P:		
(D)	Teller re Thailand	Hearsay		
565	Email from Jake Maxwell Watts	P:		
(D)	to James Gleeson; SpaceX Media	• Hearsay		
	Relations re Wall Street Journal	• Cumulative		
566	urgent deadline Email from James Gleeson to	P:		
(D)	Jake Maxwell Watts; SpaceX	• Hearsay		
	Media Relations re Wall Street	<ul><li>Cumulative</li></ul>		
11	Journal urgent deadline	- Cumulative		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	567	Email from Robin Sielert to Mike	P:		
3	(D)	Kato; Dave Lua; Nuttapon Nakarach et al. re SpaceX	<ul><li>Hearsay</li><li>Cumulative</li></ul>		
4	7.60	contract	7		
5	568 (D)	Elon Musk Tweet: A second one that is 30cm shorter is almost complete	P:  • Hearsay		
6	569	Elon Musk Tweet: According to	P:		
7	(D)	divers who have made the	<ul> <li>Hearsay</li> </ul>		
8		journey, this is capable of maneuvering through all passages			
	570	Elon Musk Tweet: According to	P:		
9	(D)	divers who have made the	<ul> <li>Hearsay</li> </ul>		
10		passage, yes. However, we also			
11		made an exact replica that is inflatable, so that the entire path			
		can be tested without risk of			
12		blockage.			
13	571 (D)	Elon Musk Tweet: Buoyancy adjusted by strapping diver	P:		
14	(D)	weight belts around body of	Hearsay		
		capsule. They're prevented from			
15		sliding off by the 6 diver handhold attachments			
16	572	Elon Musk Tweet: Design based	P:		
17	(D)	on dive team feedback (primarily	<ul> <li>Hearsay</li> </ul>		
		Stanton): 4 air / oxygen ports			
18		front & rear, front ports protected by nosecone. Dual O-ring seal on			
19		acrylic rear plate with clear view			
20		of occupant head. Leak/buckling			
	573	proof to 10X cave water pressure.  Elon Musk Tweet: Diver weight	P:		
21	(D)	belts wrapped around outside.	• Hearsay		
22		Mini-sub only weighs ~40kg dry,			
23		so easy to carry on long dry sections of cave, then add weight			
		belts for wet sections.			
24	574	Elon Musk Tweet: Given Chiang	P:		
25	(D)	Rai airport hours, soonest we	• Hearsay		
26		could've departed US was an hour ago, but cave now closed for			
		diver rescue. Will continue			
27		testing in LA in case needed later			
28		or for somewhere else in future.			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	575	Elon Musk Tweet: It is an honor	P:		
3	(D)	to work with them	<ul> <li>Relevance</li> </ul>		
	576	Elon Musk Tweet: Mini-sub	P:		
4	(D)	arriving in about 17 hours.	<ul> <li>Hearsay</li> </ul>		
5		Hopefully useful. If not, perhaps it will be in a future situation.			
6	577	Elon Musk Tweet: Pretty close.	P:		
_	(D)	There is a nosecone on the front	<ul> <li>Hearsay</li> </ul>		
7		to protect against rocks impacting fwd air hoses with a hole on the			
8		side for hoses to exit.			
	578	Elon Musk Tweet: Simulating	P:		
9	(D)	maneuvering through a narrow	• Hearsay		
10		passage	Tiearsay		
10	579	Elon Musk Tweet: Thanks, but	P:		
11	(D)	we've not done anything useful	<ul> <li>Relevance</li> </ul>		
10		yet. It is all other people.			
12	580	Elon Musk Tweet: Video	P:		
13	(D)		<ul> <li>Hearsay</li> </ul>		
	581	Elon Musk Tweet: Yeah, that	P:		
14	(D)	sounds cool. Music makes things	<ul> <li>Hearsay</li> </ul>		
15		better. Calms the mind. Adding			
		padded wall pockets for a hand radio & phone/music player.			
16	582	Email from Elon Musk to Steve	P:		
17	(D)	Davis; Zach Dunn re This Is Elon	Hearsay		
1 /		Musk	11001201		
18	583	Email from Sean Pitt to Michelle	P:		
10	(D)	Monroe; SpaceX Media Relations	<ul> <li>Hearsay</li> </ul>		
19		re Associated Press media inquiry	<ul> <li>Relevance</li> </ul>		
20	584	Email from Will Heltsley to Zach	P:		
	(D)	Dunn; Christopher Bowman;	<ul> <li>Hearsay</li> </ul>		
21		Vincent Werner et al. re pod			
22		documentation for discussion			
	585	with govt officials, if required  Email from Zach Dunn to Elon	P:		
23	(D)	Musk; Thailand re This Is Elon	• Hearsay		
24		Musk	<ul><li>Cumulative</li></ul>		
	586	Email from Zach Dunn to	P:		
25	(D)	Vincent Werner; Mark	Hearsay		
26		Concannon; Florence Li et al. re	Relevance		
∠∪		Pegasus			
27	587	Submarine Test (Video)			
	(D)				

	xhibit o.	Description	(	Objections	Date Identified	Date Admitted
	88 O)	Submarine Test (Video)				
4   58 (I	89 O)	Email from Christopher Eby to Steve Davis; Thailand re Am about to enter China airspace.	P:	Hearsay		
5		Please feel free to reply via SpaceX twitter.				
59	90 O)	Email from James Gleeson to Nur-Azna Sanusi re REUTERS REQUEST PERMISSION TO USE WING INFLATABLES	P: •	Hearsay		
9	91	IMAGES Email from James Gleeson to	P:			
	)) ))	Sam Teller re Q's for WIRED story on Thai cave rescue	•	Hearsay		
	92 O)	Email from Yazhou Sun to James Gleeson; SpaceX Media Relations re CNN International	P: •	Hearsay		
13 59	93	Interview Enquiry - Elon Musk Lin Wood Tweet: There are so	P:			
[4] (I	<b>O</b> )	many incredibly heroic and good people in the world	•	Relevance Hearsay		
	94 O)	Article: Meet the seven British divers playing leading roles in the Thai cave rescue mission	P: •	Hearsay		
L /	95 O)	Elon Musk Tweet: Good for rescuing vulnerable patients in dangerous environments,	P: •	Hearsay		
19		particularly if water, toxic gas or dangerous bacteria/viruses				
20		present, as patient would remain dry & at std air pressure entire time.				
	96	Elon Musk Tweet: Great news	P:			
$\begin{bmatrix} 22 \\ 22 \end{bmatrix}$	<b>O</b> )	that they made it out safely. Congratulations to an outstanding	•	Relevance		
23 59	97	rescue team! Elon Musk Tweet: Just returned	P:			
′. <b>4+</b>	))	from Cave 3. Mini-sub is ready if needed. It is made of rocket parts	•	Hearsay		
26		& named Wild Boar after kids' soccer team. Leaving here in case				
27		it may be useful in the future. Thailand is so beautiful.				
28					l	1

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	598	Elon Musk Tweet: Moreover,	P:		
3	(D)	based on extensive cave video	<ul> <li>Hearsay</li> </ul>		
4		review & discussion with several			
4		divers who know journey, SpaceX engineering is absolutely			
5		certain that mini-sub can do entire			
6		journey & demonstrate at any			
6		time.			
7	599	Email from Armor Harris to	P:		
8	(D)	Thailand re U.S. Embassy	<ul> <li>Hearsay</li> </ul>		
o		Bangkok/U.S. Commercial Service Thailand			
9	600	Email from James Gleeson to	P:		
10	(D)	Michelle Monroe; SpaceX Media	<ul> <li>Hearsay</li> </ul>		
		Relations; Sean Pitt re Associated			
11	601	Press media inquiry	P:		
12	601 (D)	Email from James Gleeson to Yazhou Sun; SpaceX Media	• Hearsay		
		Relations re CNN International	Ticalsay		
13		Interview Enquiry - Elon Musk			
14	602	Elon Musk Tweet: Glad to hear	P:		
1.5	(D)	that. Engineering team also	<ul> <li>Hearsay</li> </ul>		
15		getting feedback from the British dive team on how to improve the			
16		design for future applications.			
17	603	Elon Musk Tweet: This reaction	P:		
	(D)	has shaken my opinion of many	<ul> <li>Hearsay</li> </ul>		
18		people. We were asked to create a			
19		backup option & worked hard to do so. Checked with dive team			
		many times to confirm it was			
20		worthwhile. Now it's there for			
21		anyone who needs it in future.			
		Something's messed up if this is not a good thing.			
22	604	Elon Musk Tweet: Yes. Caves are	P:		
23	(D)	now filled with water again.	Hearsay		
24		Difficulty of passage is massively			
		dependent on water level. Little			
25		kids can walk/swim in when low, but it can be deadly to pro divers			
26		when high. Pump & generator			
		engineering team deserves some			
27		credit for the rescue.			
28					

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Exhibit No.	Description	Objections	Date Identified	Date Admitted
605 (D)	Email from Chris Bowman to Christopher Bowman re Pegasus	P:  • Hearsay • Relevance		
606 (D)	Email from Christopher Wallden to James Gleeson; Armor Harris; Sam Teller re Thailand Cave Rescue PBS NOVA	P:  • Hearsay		
607 (D)	Email from Sam Teller to DL-USComms re Thai cave rescue: Elon Musk's plan to help involved a mini-submarine — Vox	P:     Hearsay     Relevance		
608 (D)	Text from Unknown to Elon Musk re British cave team	P:  • Hearsay		
609 (D)	Article: "This is madness": A rescue diver on what it was like to save the Thai boys in the cave	P:  • Hearsay		
610 (D)	Elon Musk Tweet: The pumps I saw were running v high flow rate all the way from cave 3. They	P: • Hearsay		
	stopped shortly after boys were rescued & water level rose to roof level all way back to cave 1. That was great work.			
611 (D)	Email from Elon Musk to Keith Cowing re Tired of @ElonMusk/@SpaceX rescue bashing	P: • Hearsay		
612 (D)	Email from Sam Teller to Alexander Davies; James Gleeson; SpaceX Media Relations; W D re Q's for WIRED story on Thai cave	P:  • Hearsay		
613 (D)	Article: 'Time is running out': Inside the treacherous rescue of boys trapped in a Thai cave	P:  • Hearsay		
614 (D)	Article: British diver recalls Thai cave rescue: 'Are we heroes? No'	P:  • Hearsay		
615 (D)	Email from James Gleeson to Sam Teller; Steve Davis; Sean Pitt re CNN: Cave rescuer slams Elon Musk's submarine idea			

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	616	Article: Elon Musk 'Can Stick	P:		
3	(D)	His Submarine Where It Hurts,' Says Diver in Thai Cave Rescue	• Hearsay		
4	617	Article: Elon Musk 'can stick his	P:		
5	(D)	submarine where it hurts' says British diver who helped Thai	• Hearsay		
6	618	Cave rescue			
7	(D)	Email from Google Alerts to Elon Musk re Google Alert - Elon musk			
8	619	Email from Katherine Chan to			
9	(D)	Sarah O'Brien re CNN Facebook,			
9		Cave rescuer slams Elon Musk's			
10	(20)	submarine idea	D.		
1 1	620	Article: Exclusive interview with Thai cave rescue hero Vernon	P:		
11	(D)	Unsworth: 'If the Brits hadn't	<ul> <li>Hearsay</li> </ul>		
12		been called in, it would have been			
1.2		too late'			
13	621	Email from Julia Wong to Elon	P:		
14	(D)	Musk re Accusing diver of being	<ul> <li>Hearsay</li> </ul>		
		a pedophile			
15	622	Email from Press to Sam Teller re			
16	(D)	Request for response to British			
		diver's comments re: Thai cave rescue submarine idea			
17	623	Email from Remy Smidt to			
18	(D)	SpaceX Media Relations re			
		BuzzFeed News: Request for			
19		comment			
20	624	Total views of an article			
20	(D)	published on buzzfeednews.com			
21	625	Article: Elon Musk And British	P:		
22	(D)	Diver Exchange Harsh Words	<ul> <li>Relevance</li> </ul>		
22	(2.6	Over Thai Cave Rescue			
23	626	Email from Avi Selk to SpaceX			
24	(D)	Media Relations; Press@tesla.com re Seeking			
24		comment on Musk "pedo"			
25		comments and fallout			
	627	Email from Elon Musk to Elon	P:		
26	(D)	Musk re Tweet by Walter M. on	<ul> <li>Hearsay</li> </ul>		
27		Twitter	<ul> <li>Prejudice</li> </ul>		
28			<ul> <li>Misleading</li> </ul>		

Exhibit No.	Description		Objections	Date Identified	Date Admitted
628	Email from Google Alerts to	P:			
(D)	jehn@boringcompany.com re	•	Hearsay		
	Google Alert - elon musk	•	Relevance		
629	Email from James Gleeson to				
(D)	David Harris; Tim Hughes re				
	Thai tweets				
630	Mark Stephens Tweet: British	P:			
(D)	cave diver considering legal	•	Hearsay		
	action over Elon Musk's (utterly	•	Relevance		
631	false) 'pedo' Twitter attack PPTV เปดใจ "เวรน อนสเวรธ"				
(D)	กญแจสาคญภารกจชวย 13 ชวต -				
(D)	เขมขาวคา (Video)				
632	Total views of an article				
(D)	published on buzzfeednews.com				
633	-	P:			
(D)	Elon Musk Tweet: And mostly nobody mentioned the letter Elon	r:	Цоомаст		
(D)	got from Richard "Rick" Stanton,	•	Hearsay		
	who IS a very experienced				
	RESCUE DIVER. Stanton to				
	Elon: "We're worried about the				
	smallest lad please keep working				
	on he capsule details" Y cnt				
	@elonmusk share importnt				
	concerns on his priv. Tw. acc?				
634	Email from Erica Chen to Sarah				
(D)	O'Brien; Dave Arnold re				
(25	Coverage on E's tweet	D			
635	Email from Philip Sherwell to	P:	T.T		
(D)	Vernon Unsworth re The Sunday	•	Hearsay		
(2)	Times p2-3	D.	Relevance		
636	Mark Stephens Tweet: Diver	P:	Dalarranaa		
(D)	Who Helped Thai Boys May Sue Elon Musk After Billionaire	•	Relevance		
	Labelled Falsely Him A 'Pedo'	•	Hearsay		
637	Ryan Mac Tweet: Elon Musk				
(D)	tries to apologize and admits he				
(2)	called the rescue diver a				
	pedophile in anger, but not before				
	he accuses him of lying. This is				
	going to be red meat for the				
	diver's lawyers.				
638	Article: Elon Musk and the Thai	P:			
(D)	cave rescue: a tale of good	•	Hearsay		
	intentions and bad tweets				

Exhibit No.	Description		Objections	Date Identified	Date Admitted
639 (D)	Article: Elon Musk apologizes for calling Thailand rescue diver a 'pedo'	P:	Hearsay		
640 (D)	Email from Elon Musk to Mike Schwartz re Thank You	P: •	Hearsay		
641 (D)	Mark Stephens Tweet: Elon Musk apologises to diver for Twitter attack	P: •	Relevance Hearsay		
642 (D)	Vernon Unsworth Instagram: Tham Luang Thailand Rescue	P: •	Hearsay Relevance		
643 (D)	Elon Musk Tweet: I apologized. Do you stand by your guillotine statement or not?	P:	Hearsay		
644 (D)	Email from Dave Arnold to Todd Maron; Sam Teller; Sarah O'Brien re he Daily Mail, EXCLUSIVE: 'Elon should be				
	shot!' Mother of hero British caver says billionaire Musk needs his mouth taped up for calling her son 'pedo guy'				
645 (D)	Letter from Lieutenant General Sunai Praphuchanay to Elon Musk re Appreciation and Gratitude	P:	Hearsay		
646 (D)	Email from Philip Sherwell to Vernon Unsworth re Letter from an ST reader	P: •	Hearsay Relevance		
647 (D)	Email from Philip Sherwell to Vernon Unsworth re Vernon Unsworth	P:	Hearsay Relevance Prejudice		
648 (D)	Email from Matt Gutman to Vernon Unsworth re Exploration - Tham Luang Monks Series	P:	Hearsay		
649 (D)	Email from Matt Gutman to Vernon Unsworth re Tham Luang Cave	P:	Relevance		
650 (D)	Email from Vernon Unsworth to Matt Gutman re Tham Luang Cave	P:	Relevance		

1	Exhibit No.	Description		Objections	Date Identified	Date Admitted
2 3 4	651 (D)	Email from Vernon Unsworth to Matt Gutman re Video 2 Does this work better - Tham Luang Monks Series	P:	Relevance		
5	652 (D)	Vernon Unsworth photo  Email from Elon Musk to Kimmy	P:	Relevance Cumulative		
7	(D)	Hart Bennett re Defamation of Vernon Unsworth				
8 9	654 (D)	Email from Kimmy Hart Bennett to Elon Musk; Mark Stephens; Lin Wood re Defamation of				
10	655	Vernon Unsworth Email from Kimmy Hart Bennett				
11 12	(D)	to ElonMuskOffice; Mark Stephens; Lin Wood re Defamation of Vernon Unsworth				
13	656 (D)	Email from Kimmy Hart Bennett to				
14 15		ElonMuskOffice@SpaceX.com; Mark Stephens; Lin Wood re				
16 17	657 (D)	Defamation of Vernon Unsworth Email from Matt Gutman to Martin Ellis; Vernon Unsworth re your surveys	P:	Hearsay Relevance		
18 19	658 (D)	Email from Mark Stephens to Lin Wood; Taylor Wilson; Elizabeth Morley; Nikita Sellers re Veron	P: •	Hearsay Relevance		
20 21	659 (D)	Unsworth Email from Martin Ellis to Vernon Unsworth; Matt Gutman re your surveys	P:	Hearsay		
22 23	660 (D)	Email from James Brickhouse to Jupiter Military & Tactical Systems re Invoice Project	P:	Relevance Hearsay		
24	661 (D)	Rowena Email from Vernon Unsworth to Mark Stephens; Elizabeth	P:	Ноотсом		
<ul><li>25</li><li>26</li></ul>		Morley; Nikita Sellers re This is Elon Musk	•	Hearsay		
27	662 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is	P:	Hearsay		
28		Elon Musk	11			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
663 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P:  • Hearsay		
664 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P:  • Hearsay		
665 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P:  • Hearsay		
666 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P:  • Hearsay		
667 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P:  • Hearsay		
668 (D)	Email from Vernon Unsworth to Mark Stephens; Elizabeth Morley; Nikita Sellers re This is Elon Musk	P:  • Hearsay		
669 (D)	Email from Jupiter Private to James Brickhouse re Project Rowena	P:  • Hearsay		
670 (D)	Email from Jupiter Private to James Brickhouse re Project Rowena	P:  • Hearsay		
671 (D)	Email from Werachon Sukondhapatipak to Steve Davis re Greeting from Thailand	P:  • Hearsay		
672 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Project Rowena	P:  • Hearsay		
673 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Jupiter's -	P:  • Hearsay		
674 (D)	Capability Statement  Letter from Ambassador Virachai  Plasai to Elon Musk re Deep  Appreciation	P:  • Hearsay		
675 (D)	Email from Jupiter Military & Tactical Systems to Jim Brickhouse re Project Rowena	P:  • Hearsay		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	676	Email from Jupiter Private to Jim	P:		
3	(D)	Brickhouse re Project Rowena	• Hearsay		
4	677 (D)	Vernon Unsworth Instagram: Back	P: • Relevance		
5	678 (D)	Email from James Brickhouse to Jupiter Private re Project Rowena	P:  • Hearsay		
6 7	679 (D)	Article: Elon Musk Has Revisited His Baseless Pedophile Claims			
8	680 (D)	Drew Olanoff tweet string with Ryan Mac and Elon Musk			
9	681 (D)	Email from Elon Musk to Sam Teller; David Arnold re Has Elon investigated "moderhile" eloims?	P:  • Hearsay		
10	682	investigated "pedophile" claims?  Email from James Brickhouse to	P:		
11	(D)	Jupiter Private re Target visit to 10 Downing Street	• Hearsay		
12 13	683 (D)	Email from Sam Teller to Jared Birchall; Elon Musk re Has Elon investigated "pedophile" claims?	P:  • Hearsay		
<ul><li>14</li><li>15</li></ul>	684 (D)	Email from Charles Delaville to Dave Arnold; Caroline Nolan; Keely Sulprizio et al. re Reporters	P:  • Hearsay		
16		reaction to Elon's tweet			
17	685 (D)	Email from Dave Arnold to Russ Mitchell; Caroline Nolan re elon's at it again	P:  • Authenticity (incomplete		
18		Tien e at to again	email)  • Hearsay		
19	686	Email from Eleanor Barker to	P:		
20	(D)	Ben Smith; Ryan Mac re Elon Musk	<ul><li>Relevance</li><li>Hearsay</li></ul>		
<ul><li>21</li><li>22</li></ul>	687 (D)	Lin Wood Tweet: The British Diver Elon Musk Called A	P: • Relevance		
23		"Pedo" Threatened To Sue Him For Libel	Hearsay		
24	688 (D)	Email from Elon Musk to Ryan Mac re Letters	P:  • Hearsay		
25	689 (D)	Email from Jupiter Military & Tactical Systems to Jim	P:  • Hearsay		
26		Brickhouse re Update from Thailand			
<ul><li>27</li><li>28</li></ul>	690 (D)	Email from Lin Wood to Ryan Mac re Quote	P: • Relevance		

1	Exhibit No.	Description	Objections	Date Identified	Date Admitted
2	691	Email from Lin Wood to Ryan	P:		
3	(D)	Mac re Defamation of Vernon Unsworth	• Relevance		
4	692	Email from Lin Wood to Ryan	P:		
5	(D)	Mac re Defamation of Vernon	<ul> <li>Relevance</li> </ul>		
_	693	Unsworth Email from Lin Wood to Ryan	P:		
6	(D)	Mac re Defamation of Vernon	• Relevance		
7	. ,	Unsworth			
8	694	Email from Ryan Mac to Lin	P:		
	(D)	Wood re Quote	<ul><li>Relevance</li><li>Hearsay</li></ul>		
9	695	Article: EXCLUSIVE: 'I am NOT	P:		
10	(D)	a child bride! Hero British diver's FORTY-year-old girlfriend	• Hearsay		
11		demolishes 'laughable' claims by			
12		billionaire Elon Musk that he 'is a			
		paedophile who married a 12-year-old'			
13	696	Email from Ben Smith to Dave	P:		
14	(D)	Arnold re BuzzFeed News: Elon	<ul> <li>Hearsay</li> </ul>		
15	697 (D)	Email from Dave Arnold to Elon Musk re Heads up: Buzzfeed	P:  • Hearsay		
16		article re: letter from Unsworth attorney	110011200		
17	698	Email from Dave Arnold to	P:		
18	(D)	Juleanna Glover re BuzzFeed News: Elon	• Hearsay		
19	699	Email from Dave Arnold to Ryan	P:		
20	(D)	Mac re BuzzFeed News: Elon	Hearsay		
	700 (D)	Email from Elon Musk to Juleanna Glover re BuzzFeed			
21	701	Email from Ryan Mac to Dave	P:		
22	(D)	Arnold re BuzzFeed News: Elon	<ul> <li>Hearsay</li> </ul>		
23	702	Email from Ryan Mac to Lin	P:		
	(D)	Wood re Quote	• Relevance		
24	703	Article: Elon Musk Calls	• Hearsay		
25	(D)	Thailand Cave Diver a 'Child			
26	, ,	Rapist' in Angry Email			
	704	Article: Elon Musk tells a			
27	(D)	reporter to 'stop defending child rapists' as he doubles down on			
28		attacking Thailand cave rescuer			
			· 47 -		

1 Exhibit No.	Description	Objections	Date Identified	Date Admitted
2 705	Email from James Brickhouse to	P:		
3 (D)	Jupiter Private re Project Rowena	<ul> <li>Hearsay</li> </ul>		
4 706 (D)	Email from Jupiter Private to Jim Brickhouse re Project Rowena	P:  • Hearsay		
5 707	Email from Matt Gutman to	P:		
6 (D)	Vernon Unsworth re a graph about you	• Relevance		
	about you	<ul><li>Hearsay</li><li>Prejudice</li></ul>		
7   708	Email from Lin Wood to Ryan	P:		
8 (D)	Mac; Mark Stephens re Complaint filed	Relevance		
9 709	Email from Ryan Mac to Dave	P:		
0 (D)	Arnold re unsworth defamation suit	Hearsay		
$1 \parallel \frac{710}{(D)}$	Lin Wood Tweet: Vern Unsworth	P:		
2 (D)	has taken the first step toward vindicating his good name.	<ul><li>Relevance</li><li>Hearsay</li></ul>		
	@elonmusk has been sued for	Ticarsay		
3	defamation.			
$4 \frac{711}{(D)}$	Article: Thai cave rescue diver sues Elon Musk for defamation			
(D)	over repeated 'pedo' comments			
712	Email from Lin Wood to Ryan	P:		
6 (D)	Mac; Mark Stephens re Vernon	<ul> <li>Relevance</li> </ul>		
7	Unsworth	Hearsay		
/13	Email from Elon Musk to Marc Benioff re Headlines	P: • Relevance		
8    (D)	Bellion te meadines	Hearsay		
9 714	The Boys in the Cave: Deep	P:		
(D)	Inside the Impossible Rescue in	• Relevance		
	Thailand, by Matt Gutman	Waste of Time		
1 715 (D)	Text from Richard Harris to Vernon Unsworth	P: • Relevance		
2    (B)	vernon onsworth	Hearsay		
716	Miracle in the Cave: The 12 Lost	P:		
$3 \parallel (D)$	Boys, Their Coach, and the	<ul> <li>Hearsay</li> </ul>		
4	Heroes Who Rescued Them, by	Waste of Time		
5 717	Liam Cochrane Article: Miracle At Tham Luang	P:		
(D)	Theore. Willacte Att Thaili Lualig	• Hearsay		
5 718	Email from Vernon Unsworth to	P:		
7 (D)	Liam Cochrane; William	• Relevance		
8	Robinson re Your Book	• Hearsay		
8		Prejudice		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
719	Email from Philip Sherwell to	P:		
(D)	Vernon Unsworth re Weekend	<ul> <li>Relevance</li> </ul>		
	story	Hearsay		
720	Vernon Unsworth Instagram:	P:		
(D)	Tham Sai Thong Cave	Relevance		
721	Email from Lin Wood to Ryan	P:		
(D)	Mac; Mark Stephens re Musk	• Relevance		
722	motion to dismiss	Hearsay		
722	Email from Ryan Mac to Lin	P:		
(D)	Wood; Mark Stephens re Musk motion to dismiss	Relevance		
722	Article: New Year Honours 2019:	Hearsay		
723 (D)	Divers honoured for Thai cave			
(D)	rescue			
724	Article: British Cave Divers			
(D)	Receive Royal Honors			
725	Email from Lin Wood to Ryan	P:		
(D)	Mac; Mark Stephens re checking	<ul> <li>Relevance</li> </ul>		
	in on Musk case	<ul> <li>Hearsay</li> </ul>		
726	Lin Wood Tweet: Fun fact:	P:		
(D)	Unsworth's US lawyer is L Lin	<ul> <li>Relevance</li> </ul>		
	Wood, who is also representing	<ul> <li>Hearsay</li> </ul>		
	Covington student Nick			
	Sandmann in his lawsuit against			
727	the Washington Post. Lin Wood Tweet: Lawyers for	P:		
(D)	Vernon Unsworth, the British	• Relevance		
(D)	cave rescuer that Elon Musk	Hearsay		
	called a "pedo-guy," just filed a	Ticarsay		
	response in response to Musk's			
	request that his defamation			
	lawsuit be dismissed.			
728	Email from Lin Wood to Ryan	P:		
(D)	Mac; Mark Stephens; Taylor	• Relevance		
	Wilson re checking in on Musk	• Hearsay		
	case			
		- 49 -		

N	xhibit [0.	Description	(	Objections	Date Identified	Date Admitted
	29 O)	Lin Wood Tweet: Vernon Unsworth's opposition brief to Elon Musk's motion to dismiss directly addresses the issue of defamation on Twitter & the misconception that "opinion" has wholesale First Amendment protection. It does not. If interested in these issues, brief is	P: •	Relevance Hearsay		
8 73 9 (I	30 O)	a Musk read  Email from Vernon Unsworth to Matt Gutman re Dear Sir - hello mate, just checking in	P:	Relevance Prejudice Hearsay		
11    (I	31 O)	Email from Ryan Mac to Lin Wood re court on Monday	P:	Relevance Hearsay		
	32 O)	Email from Ryan Mac to Lin Wood re court on Monday	P: •	Relevance Hearsay		
	33 O)	Email from Ryan Mac to Lin Wood re denial of motion to dismiss	P: •	Relevance Hearsay		
	34 D)	Lin Wood Tweet: Just notified that Elon Musk motion to dismiss Vernon Unsworth defamation case has been DENIED. Full order to be issued. Huge win as we move closer to achieving accountability for false accusations.	P: •	Relevance Hearsay		
73	35 O)	Chat text between Vernon Unsworth and Josh Morris	P:	Relevance		
${73}$	36 D)	Lin Wood Tweet: "The significance of the ruling is clear: publication of accusations on Twitter does not provide a safe harbor for defamatory statements that are false and convey that they are factual."	P: •	Relevance Hearsay		
26 27 28					1	
_		JOINT E	- <u>50 -</u> XHIBIT	LIST		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
737 (D)	Lin Wood Tweet: "To assert that Mr. Unsworth's reputation was not damaged by Musk's false	P:  • Relevance • Hearsay		
	accusations of pedophilia hints of desperation and ignores the fact	Treatsay		
720	that the law presumes damage in such cases."			
738 (D)	Lin Wood Tweet: Elon Musk's "Twitter and opinion" defenses to Vernon Unsworth's defamation	P:     Relevance     Hearsay		
	lawsuit legally misfired and he totally missed the target. Jury trial	• Hearsay		
739	in October. Email from Ryan Mac to Lin	P:		
(D)	Wood re BuzzFeed News: In Atlanta	<ul><li>Relevance</li><li>Hearsay</li></ul>		
740 (D)	Email from Ryan Mac to Lin Wood re BuzzFeed News: In Atlanta	P: • Relevance		
741 (D)	Article: British diver who helped rescued Thai football team from	<ul><li>Hearsay</li><li>P:</li><li>Hearsay</li></ul>		
(D)	cave receives MBE at Buckingham Palace	Ticarsay		
742 (D)	Email from Vernon Unsworth to Mark Stephens; Lin Wood; David	P: • Relevance		
743 (D)	Hooper et al. re Nice Work! Email from Vernon Unsworth to Adam Fellows re Thamluang			
744	24/6/61 Email from Vernon Unsworth to			
(D)	Mark Stephens; David Hooper; Elizabeth Morley; Hugo Mason re			
745 (D)	Description Email from Vernon Unsworth to Adam Fellows re AP News:	P:		
	Diver who helped with Thai cave rescue sues Elon Musk	• Hearsay		
746 (D)	Email from Vernon Unsworth to Adam Fellows re Functionality of the Musk Submarine from Video	P:  • Hearsay		
747 (D)	evidence Email from Vernon Unsworth to Adam Fellows re Musk's Pretty			
(D)	Tube			

Exhibit No.	Description	Objections	Date Identified	Date Admitted
748 (D)	Email from Vernon Unsworth to Adam Fellows re Thoughts from Bangkok	P:     Hearsay     Relevance     Prejudice		
749 (D)	Email from Vernon Unsworth to Adam Fellows re Greetings	P:      Hearsay     Relevance     Prejudice		
750 (D)	Email from Vernon Unsworth to Adam Fellows re Interview request for children's nonfiction book on the Wild Boars rescue	P:      Hearsay     Relevance     Prejudice		
751 (D)	Email from Vernon Unsworth to Adam Fellows re KEVIN MACDONALD FEATURE DOCUMENTARY aka THAI CAVE RESCUE	P:      Hearsay     Relevance     Prejudice		
752 (D)	Email from Vernon Unsworth to Adam Fellows re Thailand Kings Award - Tham Luang Cave Rescue	P:     Hearsay     Relevance     Prejudice		
753 (D)	Email from Vernon Unsworth to Adam Fellows re Bid for BBG News Podcast Beyond Today	P:      Hearsay     Relevance     Prejudice		
754 (D)	Email from Vernon Unsworth to Adam Fellows re Greetings	P:      Hearsay     Relevance     Prejudice		
755 (D)	Email from Vernon Unsworth to Adam Fellows re Vern - First Visit/Entry into Thailand July 2011	P:  • Hearsay • Relevance		
756 (D)	Email from Vernon Unsworth to Adam Fellows re Vern - Resume re Tham Luang Foreign Ministers Visit	P: • Relevance		
757 (D)	Email from Vernon Unsworth to Adam Fellows re Welcome Letter for Mr. Unsworth, Vernon Harry			
758 (D)	Email from Ben Reymenants to Steve Davis re Cave rescue 3D mapper and rescue pod	P:     Hearsay     Prejudice		

Exhibit No.	Description	Objections		Date Identified	Date Admitted
759	Email from Chris Bowman to	P:			
(D)	Christopher Bowman re Cave	•	Relevance		
760	Survey Email from Chris Bowman to	P:			
760 (D)	Christopher Bowman re Survey	P:	Relevance		
(D)	help		Relevance		
761	Email from Chris Bowman to				
(D)	Christopher Bowman re Tham				
	Luang Rescue				
762	Email from Chris Bowman to	P:			
(D)	Christopher Bowman re Tham	•	Relevance		
7.62	Luang SpaceX survey data	•	Hearsay		
763	Lin Wood Tweet: In Vernon	P:	D -1		
(D)	Unsworth case, I deposed Elon Musk all day on Thursday in LA.	•	Relevance		
	When Musk deposition transcript		Hearsay		
	& video are eventually filed with				
	the Court, truth about Musk will				
	be publicly revealed. The				
	emperor has no clothes.	_			
764 D)	Email from Vernon Unsworth to	P:	11		
D)	Lin Wood; Mark Stephens; Taylor Wilson; Matt Wood re	•	Hearsay		
	Ben Reymanants				
765	Email from Vernon Unsworth to	P:			
(D)	Taylor Wilson; Lin Wood re Pedo	•	Hearsay		
	comment				
766	BuzzFeed News Standards and	P:			
(D)	Ethics Guide	•	Relevance		
7.7	I' W 1T (TI ( C)	• D	Prejudice		
767	Lin Wood Tweet: The tip of the	P:	Dalarranas		
(D)	iceberg.	•	Relevance Hearsay		
768	Lin Wood Tweet: Elon Musk	P:	11carsay		
(D)	says 'pedo guy' tweet did not	•	Relevance		
<b>、</b> /	suggest British cave diver was a	•	Hearsay		
	pedophile				
769	Lin Wood Tweet: The man who	P:			
(D)	was integral to saving the lives of	•	Relevance		
	12 boys & their soccer coach —	•	Hearsay		
	Vernon Unsworth, M.B.E.	<u> </u>			
		53			
	JOINT E	- <u>53</u> - Унівіт і	TZI		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
770 (D)	Herbert du Plessis Tweet: Yes	P:  Relevance Foundation Prejudice Hearsay		
771 (D)	Hussein Badat Tweet: Probably a Pretoria Boys High thing. I was there fifteen years later and nothing would surprise me about that school. Apparently things have changed for the better since	P:     Relevance     Foundation     Prejudice     Hearsay		
772 (D)	John Thismyname Tweet: I have mates that were in his old highschool that use the phrase quite often. So perhaps it's just from that part.	P:     Relevance     Foundation     Prejudice     Hearsay		
773 (D)	Johurg lawyer Tweet: Yes it's true. It was used in the 705 and 805 when my brothers and I were at school and university. It was a mildly derogatory term for anyone who was irritating or who did something stupid. Mostly just limited to "pedo". Never meant as a word to accuse someone of paedophilia.	P:     Relevance     Foundation     Prejudice     Hearsay		
774 (D)	Lin Wood Tweet: No, "pedo guy" is not a harmless South African slang term   The Outline	P:     Relevance     Hearsay		
775 (D)	miro Tweet: Was certainly used in the Sandton area in the 80's	P:     Relevance     Foundation     Prejudice     Hearsay		
776 (D)	xsyn Tweet: I've heard it in some circles, ya.	P:  Relevance Foundation Prejudice Hearsay		
		· 54 - XHIBIT LIST		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
777 (D)	justfoodnow Tweet: I'm from the Western Cape but a good friend	P: • Relevance		
	from Pretoria always uses it - usually when talking about a	<ul> <li>Foundation</li> </ul>		
	stupid/deadbeat/miserable person.	<ul><li>Prejudice</li><li>Hearsay</li></ul>		
778 (D)	Lin Wood Tweet: Elon Musk's Defense In 'Pedo Guy'	P: • Relevance		
	Defamation Suit: Slur Meant Something E	Hearsay		
779 (D)	Ricky Bobby Tweet: Not that hard. Different words have	P: • Relevance		
	different meanings depending on	<ul> <li>Foundation</li> </ul>		
	when and how they are used. For example, if I call someone a	<ul><li>Prejudice</li><li>Hearsay</li></ul>		
	dickhole, obviously it is not meant literally, just means they			
	are unpleasant to look at and be around. Same goes for "pedo"			
780 (D)	xCountryRun Tweet: We joked about creepy old men hanging out	P: • Relevance		
	around spooky places (called them Pedo's) - I had never heard	<ul><li>Foundation</li><li>Prejudice</li></ul>		
	of pedophile or there were transgender people (we called	Hearsay		
	feminish boys pansy's — babies). In early days Pedo was a insult			
	directed at car less poor whites			
781 (D)	James Howard UK Action Fraud Report	P: • Foundation		
		<ul><li>Prejudice</li><li>Hearsay</li></ul>		
782	Email from Vernon Unsworth to	P:		
(D)	Taylor Wilson re British Team, Thann Luang Rescue	<ul><li>Relevance</li><li>Hearsay</li></ul>		
783 (D)	Email from Vernon Unsworth to Taylor Wilson re Harry book -	P: • Relevance		
(-)	Tham Luang Deal	<ul> <li>Hearsay</li> </ul>		
784	Email from Vernon Unsworth to	• Prejudice P:		
(D)	Taylor Wilson re Our client - Vern Unsworth	<ul><li>Relevance</li><li>Hearsay</li></ul>		
		• Prejudice		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
785 (D)	Email from Vernon Unsworth to Taylor Wilson re Phuket News	P:     Relevance     Hearsay     Prejudice		
786 (D)	Email from Vernon Unsworth to Taylor Wilson re The Cave - Tom Waller	P:  Relevance Hearsay Prejudice		
787 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth	P:  Relevance Hearsay Prejudice		
788 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth - more info	P:  Relevance Hearsay Prejudice		
789 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth - Tham Luang Document	P:  Relevance Hearsay Prejudice		
790 (D)	Email from Vernon Unsworth to Taylor Wilson re Vern Unsworth / Guardian Weekend	P:  Relevance Hearsay Prejudice		
791 (D)	Lin Wood Tweet: Vernon Unsworth's response to Elon Musk motion for summary judgment will be filed on Monday. It will be a detailed and fully-documented recital of the truth. Jury trial set for December 3.	P:  • Relevance • Hearsay		
792 (D)	Lin Wood Tweet: Mr. Unsworth was first informed 2 days ago that Cooley, LLP was also representing Elon Musk in September 2018 in connection with the Vernon Unsworth matter.	P:     Relevance     Hearsay		
		- 56 - XHIBIT LIST		

1	Exhibit No.	Description	Objections		Date Identified	Date Admitted
2	793	Lin Wood Tweet: Musk's	P:			
3	(D)	attorney, Alex Spiro, fails to disclose that Musk offered the		elevance earsay		
4		convicted felon a \$10,000 incentive bonus on top of his		•		
5		\$52,000 fee IF he provided VERIFIED information of				
6		"nefarious conduct" by Mr.				
7		Unsworth. The bonus was never paid because no such evidence				
8		exists.				
9	794 (D)	Lin Wood Tweet: "Musk's lawyer Alex Spiro told Business Insider	P: • R	elevance		
10		in a statement: "This case is nothing but a money-grab in	• H	earsay		
11		which Unsworth has pursued profit and self-promotion at every				
12		turn."				
13	795 (D)	Lin Wood Tweet: "When someone shows you who they are,	P:	elevance		
14	(D)	believe them the first time." - Maya Angelou		earsay		
15	796	Lin Wood Tweet: British cave	P:	4		
16	(D)	diver lashes out at 'thin skinned bully' Elon Musk		elevance earsay		
17	797 (D)	Lin Wood Tweet: Musk lawyer's comments are simply more	P: • R	elevance		
18		accusations of a dishonest Elon		earsay		
19		Musk defense & PR campaign to demean & falsely attack my				
20		client. Since the rescue, Mr. Unsworth has received a total of				
21		£2,400 for his assistance in connection with two				
22		documentaries about Thai Cave Rescue.				
23	798	Lin Wood Tweet: The efforts by	P:			
24	(D)	Musk's employees to help the kids should be commended even		elevance		
25		though the tube was not practical.	• н	earsay		
26		But Musk's personal motives for volunteering their help must be				
27		evaluated by jury in context of his need for positive publicity & his				
28		efforts to seek it for himself.				

Exhibit No.	Description	Objections	Date Identified	Date Admitted
799 (D)	Lin Wood Tweet: Vernon Unsworth spent 2 weeks working daily to save lives of 12 Thai children & coach. Elon Musk	P:     Relevance     Hearsay		
	spent 3 days trying to generate publicity for Elon Musk from a			
	miraculous rescue made possible by skills, experience, & bravery			
	of genuinely dedicated & involved volunteers. Truth.			
800 (D)	Lin Wood Tweet: For Elon Musk, the Thai Cave Rescue was about PR & his image. For Vernon	P:  • Relevance • Hearsay		
	Unsworth, it was about saving the lost children & their coach.	·		
801 (D)	Lin Wood Tweet: Wonder if China will be amenable to Elon Much DR demands? And Much	P: • Relevance		
	Musk PR demands? And Musk lawyer again attacks Vernon for receiving total of £2,400 for his	• Hearsay		
	assistance in connection with 2 documentaries but does not deny			
802	Musk's wrongdoing.  Lin Wood Tweet: As a prepare	P:		
(D)	for summary judgment hearing today in LA in Vernon Unsworth	<ul><li>Relevance</li><li>Hearsay</li></ul>		
	v. Elon Musk, the news of our team's huge win in Covington,	Tieureur		
	KY reaffirms my career—long			
	belief that our system of justice works. Nicholas Sandmann deserves his day in court against			
803	WaPo. Now he will get it.  Lin Wood Tweet: Elon Musk to	P:		
(D)	face defamation trial over Thai cave 'pedo guy' comments	<ul><li>Relevance</li><li>Hearsay</li></ul>		
804 (D)	Lin Wood Tweet: The truth is incontrovertible. Malice may attack it, ignorance may deride it,	P: • Relevance		
	but in the end, there it is Winston Churchill	• Hearsay		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
805 (D)	Lin Wood Tweet: "We look forward to the trial," Alex Spiro, an attorney for Musk, said in a statement provided to Bloomberg. "We understand that, while Musk	P:     Relevance     Hearsay		
	has apologized, Unsworth would like to milk his 15 minutes of fame."			
806 (D)	Lin Wood Tweet: When you ask to be sued & law & facts are dead against you & you have lost every motion to dismiss case after lawsuit filed, beat on the PR table	P:     Relevance     Hearsay		
	& continue to insult Vernon Unsworth. Will be very interesting to see how a jury reacts to Elon Musk defense strategy.			
807 (D)	Vernon Unsworth Instagram: Front page	P:  • Relevance • Hearsay		
808 (D)	BBC ฟง นนทชนก วงษสมทร บบชไทย - BBC Thai (Transcript)	P:  • Authentication		
809 (D)	Ben Reymenants photo	P:     Relevance     Authentication     Waste of Time		
810 (D)	Cave Map			
811 (D)	Cave Rescue Hazards Map			
812 (D)	Craig Challen photo	P:     Relevance     Authentication		
813 (D)	Detailed Cave Map	Waste of Time		
814 (D)	Diving Kids Out Image	P:  • Hearsay		
815 (D)	Document in Thai	P: • Relevance		
816 (D)	Ex. 13 Vernon Unsworth 7/13/18 CNN Interview (Transcript)	P: • Cumulative		

Exhibit No.	Description	Objections	Date Identified	Date Admitted
817	Ex. 14 Vernon Unsworth 7/13/18	P:		
(D)	CNN Interview (Transcript)	Cumulative		
818	Ex. 24 Vernon Unsworth 7/16/18	P:		
(D)	Time Interview (Transcript)	Cumulative		
819 (D)	Ex. 26 Vernon Unsworth 7/17/18 AFP Interview (Transcript)	P: • Cumulative		
820	Ex. 29 Vernon Unsworth	P:		
(D)	12/27/18 BBC Interview	• Relevance		
(-)	(Transcript)	Cumulative		
821	GoFundMe page for Saman	P:		
(D)	Kunan	<ul> <li>Relevance</li> </ul>		
822	Governor Narongsak	P:		
(D)	Osotthanakorn photo	• Relevance		
		<ul> <li>Authentication</li> </ul>		
		Waste of Time		
823	John Volanthen photo	P:		
(D)		<ul> <li>Relevance</li> </ul>		
		Authentication		
004		Waste of Time		
824	Major Saman Gunan photo	P:		
(D)		• Relevance		
925	DDTV :-  - 9- (	• Authentication P:		
825 (D)	PPTV เปดใจ "เวรน อนสเวรธ"	• Authentication		
(D)	กญแจสาคญภารกจชวย 13 ชวต - เขมขาวคา (Transcript)	Aumentication		
826	Richard Harris photo	P:		
(D)	Richard Harris photo	• Relevance		
(D)		Authentication		
		Waste of Time		
827	Rick Stanton photo	P:		
(D)	Partie	Relevance		
· /		Authentication		
		<ul> <li>Waste of Time</li> </ul>		
828	Ryan Mac photo	P:		
(D)		<ul> <li>Relevance</li> </ul>		
		<ul> <li>Authentication</li> </ul>		
		Waste of Time		
829	Submarine Diagram, Submarine,	P:		
(D)	Submarine Instructions	<ul> <li>Hearsay</li> </ul>		
0.2.6		Cumulative		
830	Submarine photos			
(D)				

Exhibit No.	Description	Objections	Date Identified	Date Admitted
831	Texts between Will Heltsley and	P:		
(D)	Armor Harris	<ul> <li>Hearsay</li> </ul>		
,		• Cumulative		
832	Thanet Natisri photo	P:		
(D)		<ul> <li>Relevance</li> </ul>		
		<ul> <li>Authentication</li> </ul>		
		<ul> <li>Waste of Time</li> </ul>		
833	The Legal 500: Howard Kennedy	P:		
(D)	LLP	<ul> <li>Relevance</li> </ul>		
		<ul> <li>Hearsay</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
834	The Legal 500: UK, London -	P:		
(D)	TMT (technology, media and	• Relevance		
	telecoms); Media and	<ul> <li>Hearsay</li> </ul>		
	entertainment (including media	<ul> <li>Prejudice</li> </ul>		
	finance); Law firm and leading			
835	lawyer rankings	P:		
(D)	Tik Dating Profile (English translation)	• Authentication		
(D)	translation)	Relevance		
		Hearsay		
		<ul><li>Prejudice</li></ul>		
836	Tik Dating Profile (Thai)	P:		
(D)	Tik Duting Frome (Thai)	• Authentication		
		Relevance		
		Hearsay		
		<ul><li>Prejudice</li></ul>		
837	Urban Dictionary definition	P:		
(D)		Relevance		
•		<ul> <li>Hearsay</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
838	Urban Dictionary definition	P:		
(D)		<ul> <li>Relevance</li> </ul>		
		<ul> <li>Hearsay</li> </ul>		
		Prejudice		
839	Vernon Unsworth and Tik photo	P:		
(D)		Relevance		
840	Vernon Unsworth and Tik photo	P:		
(D)		Relevance		
841	Vernon Unsworth and Tik photo	P:		
(D)	X	Relevance		
842	Vernon Unsworth photo			
(D)				<u> </u>

Exhibit No.	Description	Objections	Date Identified	Date Admitted
843	Vernon Unsworth photo			
(D) 844	Vernon Unsworth photo			
(D) 845	Vernon Unsworth photo			
(D) 846	Vernon Unsworth photo			
(D) 847	Vernon Unsworth photo			
(D) 848	Vernon Unsworth photo			
(D) 849	Wild Boars photo			
(D)	-	D		
850 (D)	Woranan Ratrawiphukkun photo	P:     Relevance     Waste of Time		
851 (D)	Chat transcript between Aaron and Chris Bowman	P:  • Hearsay		
852 (D)	Chat transcript between Daniel Le and Chris Bowman	P:  • Hearsay		
853 (D)	Chat transcript between Vernon Unsworth and Dr. Harry	P: • Relevance		
854 (D)	Chat transcript between Vernon Unsworth and John Volanthen	P: • Relevance		
855 (D)	Chat transcript between Vernon Unsworth and Martin Ellis	P: • Relevance		
856 (D)	Chat transcript between Vernon Unsworth and Matt Gutman	P:		
857	Chat transcript between Vernon	• Relevance P:		
(D) 858	Unsworth and Phil Collett  Chat transcript between Vernon	• Relevance P:		
(D) 859	Unsworth and Rick Stanton  Chat transcript between Vernon	• Relevance P:		
(D)	Unsworth and Thanet Natisri	Relevance		
860 (D)	Chat transcript of Thailand Ground Team	P:     Hearsay     Cumulative		
861 (D)	Chat transcript of Thailand Ground Team	P:  • Hearsay • Cumulative		

Exhibit No.	Description	Objections		Date Identified	Date Admitted
862 (D)	Complete Vernon Unsworth Chat History	P:	Relevance Cumulative		
863 (D)	Text messages between Vernon Unsworth and Vanessa Unsworth	P:	Completeness		
864 (D)	Text messages between Vernon Unsworth and Vanessa Unsworth	P:	Completeness		
865 (D)	Chat transcript between Vernon Unsworth and Derek Anderson	P: •	Relevance		
866 (D)	Chat transcript between Vernon Unsworth and Thanet Natisri	P:	Relevance		
867 (D)	Document in Thai (Translation)	P: •	Relevance Authentication (Incomplete, reserving additional objections		
868 (D)	A summary of the Tham Luang Rescue	P: •	Hearsay		
869 (D)	Article: Australian divers Richard Harris and Craig Challen return to scene of dramatic Thai cave soccer team rescue	P: •	Hearsay Relevance		
870 (D)	Liam Cochrane Tweet: In a stunning revelation, British caver Vern Unsworth says the #Thai Wild Boars football team was not trapped at 'Nerm Nom Sai' but we're at 'Pattaya Beach' all along. Mr Unsworth went in last month to help clear Tham Luang of silt. #Thailand 1/2	P: •	Hearsay Relevance		
871 (D)	Liam Cochrane Tweet: Vern Unsworth told the ABC: "Nerm Nom Sao doesn't exist, it's a figment if some joirnalist's imagination." If true, this would contradict the official account, every doco and every book (including mine!) A-Thailand 2/2	P: •	Hearsay Relevance		
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Exhibit No.	Description	Objections	Date Identified	Date Admitted
872	Ex. 33 translation certification	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
,		Authentication		
		<ul> <li>Foundation</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
		Hearsay		
873	Ex. 55 translation certification	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
		<ul> <li>Authentication</li> </ul>		
		<ul> <li>Foundation</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
		Hearsay		
874	Declaration of Jessica Probus	P:		
(D)		<ul> <li>Relevance</li> </ul>		
875	The BuzzFeed News Standards	P:		
(D)	And Ethics Guide	<ul> <li>Relevance</li> </ul>		
		<ul> <li>Prejudice</li> </ul>		
		<ul> <li>Confusion</li> </ul>		
		<ul> <li>Misleading</li> </ul>		
876	Lin Wood Tweet: @elonmusk	P:		
(D)	should check his mail before	<ul> <li>Relevance</li> </ul>		
	tweeting	<ul> <li>Hearsay</li> </ul>		
878	Cave Map	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
879	Article: Rainfall threat forces plan	P:		
(D)	rethink	<ul> <li>Hearsay</li> </ul>		
880	Texts between Elon Musk and	P:		
(D)	Zach	Hearsay		
881	Texts between Elon Musk and	P:		
(D)	Bryn	Hearsay		
882	Texts between Elon Musk and	P:		
(D)	Scott P.	Hearsay		
883	Texts between Elon Musk and	P:		
(D)	Antonio G.	Hearsay		
884	Texts between Elon Musk and Steve Davis	P:		
(D)	<u> </u>	Hearsay		
885	Texts between Elon Musk and Amor Harris	P:		
(D) 886	Texts between Elon Musk and	• Hearsay P:		
886 (D)	Sam Teller			
887	Texts between Elon Musk and	• Hearsay P:		
(D)	Sam Teller	• Hearsay		
888	Texts between Elon Musk and	P:		
(D)	Jared L.	• Hearsay		<u> </u>

Exhibit No.	Description	Objections	Date Identified	Date Admitted
889	Texts between Elon Musk and	P:		
(D)	Sam Teller	<ul> <li>Hearsay</li> </ul>		
890	Texts between Elon Musk and	P:		
(D)	Amor Harris	Hearsay		
891	Texts between Elon Musk and	P:		
(D)	Amor Harris	Hearsay		
892	Texts between Elon Musk and	P:		
(D)	Sarah O.	Hearsay		
893	Texts between Elon Musk and	P:		
(D)	David Arnold	Hearsay		
894	Texts between Elon Musk and	P:		
(D)	David Arnold	Hearsay		
895	Texts between Elon Musk and	P:		
(D)	Amor Harris	• Hearsay P:		
896 (D)	Ex. 53 translation certification	D 1		
(D)		<ul><li>Relevance</li><li>Authentication</li></ul>		
		<ul><li>Authentication</li><li>Foundation</li></ul>		
		<ul><li>Proundation</li><li>Prejudice</li></ul>		
		Hearsay		
897	Twitter profile @llinwood	P:		
(D)	1 witter prome winnwood	Hearsay		
( <b>D</b> )		• Relevance		
		<ul> <li>Prejudice</li> </ul>		
898	Twitter profile @markslarks	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
		Relevance		
		<ul> <li>Prejudice</li> </ul>		
899	Twitter profile @RMac18	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
		Relevance		
900	Twitter profile @yoda	P:		
(D)		<ul> <li>Hearsay</li> </ul>		
		Relevance		
901	Vernon Unsworth Photo	P:		
(D)	X	Relevance		
902	YouTube video Return to the	P:		
(D)	Tham Luang cave video	• Relevance		
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-	IOINT	EXHIBIT LIST		